

UNITED STATES DISTRICT COURT
for the
District of Rhode Island

United States of America
v.

David Romero Reyes, a/k/a David Romero
(YOB:1970)

Case No. 1:21-MJ-47PAS

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 2/8/201-4/2/2021 in the county of in the
District of Rhode Island, the defendant(s) violated:

Code Section Offense Description
18 USC 2423(a) Transportation with intent to engage in criminal sexual activity.

This criminal complaint is based on these facts:

See the attached Affidavit of Special Agent Lisa Crandall, of the Federal Bureau of Investigation ("FBI").

Continued on the attached sheet.

[Handwritten signature of Lisa Crandall]

Complainant's signature

Special Agent Lisa Crandall ~ FBI

Printed name and title

Sworn to before me and signed in my presence.

Sworn telephonically and signed electronically

Date: April 9, 2021

City and state: Providence, Rhode Island

[Handwritten signature of Patricia A. Sullivan]

Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF SPECIAL AGENT LISA A. CRANDALL  
IN SUPPORT OF A CRIMINAL COMPLAINT**

**INTRODUCTION**

I, Lisa A. Crandall, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since June 2010 and I am currently assigned to the Boston Division, Lakeville Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to, among other things, the sexual exploitation of children.
2. I submit this affidavit in support of a criminal complaint charging David Romero REYES (“REYES”) (YOB 1970), of Stafford, Virginia, with one count of Transportation of a Minor with intent to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a).
3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent with the FBI. Because this affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included each and every fact known to me concerning this investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

### STATEMENT OF PROBABLE CAUSE

1. On Friday April 2, 2021, a tractor trailer attempted to enter the United States Navy base Naval Station Newport, located in Newport, Rhode Island, to pick up a shipment. Prior to the tractor trailer entering the base, the NAVSTA Newport Police (Naval Station Newport Police) conducted a criminal inquiry on the operator of the tractor trailer, David Romero REYES, ("REYES") year of birth 1970. Records identified that there was an outstanding warrant for REYES from Texas for Felony Sexual Assault of a Child. REYES was taken into custody by NAVSTA.
2. NAVSTA Newport Police conducted an inventory of the tractor trailer prior to releasing it to Ronnie's Towing. During the inventory a minor female, MINOR A, was located in the sleeping area of the tractor. MINOR A was later identified as being a 15-year-old female reported missing from Virginia since July 26, 2020.
3. U.S. Department of Health and Human Services documents found in possession of MINOR A indicated that in May 2020 MINOR A was removed from a Houston, Texas immigration detention facility by REYES, who was identified as a "distant relative."
4. Upon questioning, MINOR A told police that REYES was her uncle and REYES told police that MINOR A was his daughter. During a preliminary interview of MINOR A, no disclosures of sexual contact with REYES were made.
5. MINOR A was brought to Hasbro Children's Hospital for a medical examination. Hasbro Children's Hospital determined that MINOR A was approximately five months pregnant.
6. On Saturday, April 3, 2021, REYES consented to a recorded interview with the Rhode Island State Police. Prior to questioning REYES was provided with and waived his Miranda rights. REYES initially denied any sexual relationship with MINOR A. REYES later admitted to having sex on multiple occasions with MINOR A to include Texas, in his

residence in Virginia, as well as in trucks he drove in various states to include New Jersey, New York, and Connecticut. REYES stated that MINOR A loved him and he loved MINOR A. REYES said he was not aware of MINOR A having any other boyfriends and never received payment in exchange for others engaging in sex with MINOR A. REYES estimated that he had sex with MINOR A approximately once per week since August 2020, although he subsequently claimed the last time he had sex with MINOR A was about a month ago. REYES stated that the current trip originated in Virginia within the prior two weeks and included stops in multiple states. REYES stated that the night/morning of April 2, 2021, he slept in the truck in Connecticut before traveling on to Rhode Island. REYES claimed he did not have sex with MINOR A in the tractor trailer he was stopped in, which he stated he recently obtained within the past two weeks. The truck had one bed in the sleeper compartment. Based on my training and experience in child sexual exploitation investigations, I believe individuals such as REYES who are in an ongoing sexual relationship with a minor such as MINOR A, and have custody and control of such minor, manifest an ongoing intent to engage in sexual activity with the minor until such time as they are stopped.

#### **HOUSTON POLICE DEPARTMENT RECORDS**

7. Records obtained from the Houston Police Department document an intake report filed with Child Protective Services in Texas<sup>1</sup> and dated 07/10/2020, was filed by MINOR A's aunt in Virginia, hereinafter Witness 1<sup>2</sup>. Within the CPS intake report, Witness 1 alleged that while MINOR A was in Houston, MINOR A had sex with REYES. It was noted at the

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<sup>1</sup> A CPS report was also filed in Virginia, however Virginia stated that they did not have jurisdiction.

<sup>2</sup> Witness 1's identity is known to law enforcement. Within Houston Police Department reports REYES is noted as being Witness 1's uncle.

time of the report that MINOR A was no longer in Houston and that MINOR A had been residing in Virginia for the past three weeks.

8. Information obtained from Houston Police Department identified that MINOR A's mother was contacted by Houston PD via telephone. The mother of MINOR A stated that she already reported her daughter missing and she does not have any idea where she is currently living. The mother of MINOR A stated that she knows her daughter moved to Virginia and was living with Witness 1. The mother of MINOR A stated that REYES was more of a family friend to MINOR A's father, and that the two grew up together. MINOR A's father is currently residing in EL Salvador. MINOR A's mother does not have regular contact with MINOR A's father.
9. Houston Police Department contacted Witness 1 via telephone. Witness 1 stated that she was at odds that REYES had bought MINOR A a cellphone and became suspicious of their relationship after viewing a text message REYES sent MINOR A, which Witness 1 observed while MINOR A was showing Witness 1 a TikTok<sup>3</sup> video on her phone. Witness 1 stated that after confronting MINOR A about her relationship with REYES, MINOR A disclosed that she had sex with REYES in Texas (while living with her mother). Witness 1 also confronted REYES, stating, "I can't believe you are 50 years old man having sexual intercourse with a 14-year-old child." REYES responded stating it was not his fault as MINOR A came onto him and pressured him into doing this.
10. Witness 1 stated that MINOR A's mother and aunt forced MINOR A to take drugs which was a main contributor of MINOR A leaving Texas to live with Witness 1 in Virginia.

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<sup>3</sup> Tiktok is a video sharing social networking service owned by the Chinese company ByteDance. The social media platform is used to make a variety of short-form videos that have a duration from fifteen seconds to one minute.

MINOR A told Witness 1 that her mother tried to force her into a world of prostitution. Witness 1 also stated that she had learned that REYES was having sexual relations with MINOR A's mother and aunt while in Texas. Between approximately May 2020 and late June 2020, , 2020, MINOR A was residing with her mother in Texas. At some point in late June 202, MINOR A was driven from Houston to Virginia by REYES. MINOR A lived with Witness 1 in Virginia from approximately June 23, 2020 to July 26, 2020

11. Witness 1 identified MINOR A as departing Witness 1's residence on July 26, 2020, on her bike at approximately 8:43pm. MINOR A was then picked up by REYES operating a blue 2014 Dodge Ram pickup truck with temporary Texas Plate #76670A1.

#### **INTERVIEW OF MINOR A**

12. On Friday April 9, 2021 a forensic interview of MINOR A was conducted in Providence, RI. The interview was conducted by an FBI forensic interviewer in Spanish. I observed remotely with the assistance a Rhode Island State Police detective fluent in Spanish.
13. Among other things, during the forensic interview, MINOR A disclosed that she and REYES had sexual relations on multiple occasions in various locations. She was not certain of the exact number or locations of all of the sexual activity. MINOR A and Reyes were often living in trucks REYES drove and she did not always know where they were. She stated that she remembers sexual activity occurred in hotels in Manassas, VA, and Laurel, MD, as well as Witness 1's residence and in the sleeping compartment of the tractor trailer truck(s) on multiple occasions.
14. MINOR A further stated she was released to REYES' custody from an immigration facility in Texas and the two quickly began developing a romantic relationship. REYES provided for MINOR A and told MINOR A that all the money he earned was for both of them.

MINOR A resided in the Houston, TX area with her mother and other relatives for several weeks but eventually left Texas with REYES and began living in VA with REYES's niece (MINOR A's cousin), referred to above as Witness 1. MINOR A disclosed that in Virginia, MINOR A and REYES had a conversation with Witness 1 in which they disclosed to Witness 1 that they were in a sexual relationship. MINOR A said she and REYES falsely claimed that that they had sex in Texas in order to conceal the fact they actually had sex in Witness 1's home. MINOR A was asked about an incident described in a police report which stated that REYES put a knife to his throat and stated words to the effect of "I would rather die than go to jail for what I did to you." MINOR A stated that REYES was very nervous when Witness 1 confronted him and said he could go to jail for rape, and that REYES did have a pocket knife, but that REYES was not actually suicidal.

15. MINOR A stated she believed that Witness 1, then told MINOR A's father, in El SALVADORE about the relationship between REYES and MINOR A, leading to a protective order prohibiting contact between REYES and MINOR A. (I have not independently confirmed the existence of this protective order). According to MINOR A, shortly thereafter, REYES came to Witness 1's home and gave MINOR A a phone during a family party. REYES told her not to tell anyone about it and walked away. MINOR A then used the phone to contact REYES. MINOR A departed Witness 1's home from the later that evening and REYES picked up MINOR A nearby.
16. After that MINOR A lived with REYES as his "woman." MINOR A would cook and REYES provided. The two travelled in trucks everywhere together during the week. MINOR A recalled there were four different trucks at various times. On weekends, REYES and MINOR A initially stayed in hotels and eventually rented a basement

apartment for weekends. There was one bed in two of the four trucks and sometimes they would sleep together and sometimes she would sleep at different times than him. MINOR A stated that the other two trucks had bunk beds. The truck MINOR A was found in had one bed.

17. During the week, MINOR A would travel in the truck with REYES wherever he went. MINOR A was not in school. There were trips to multiple states. MINOR A said sex between the two was not planned but would occur periodically. MINOR A did not specifically recall the last time they had sexual contact. MINOR A believes she became pregnant in October of 2020. MINOR A stated she believes REYES is the father because she has only had sex with REYES. MINOR A said REYES purchased a pregnancy test for her at some point.
18. MINOR A stated that REYES would claim MINOR A was his daughter if questioned by anyone. REYES took the documents given to her when he picked her up from the immigration facility to use as proof. (It should be noted these documents are written in English and describe REYES as a “distant relative”). MINOR A stated that on at least one occasion REYES’s boss saw her in the truck but REYES said she was his daughter. MINOR A said that otherwise no one knew she was in the truck.

#### **TRUCKING RECORDS**

19. I have reviewed records provided by FEMA TRUCKING LLC. According to the electronic logging device records, which contain daily logs, REYES used the name David ROMERO. According to the records, between February 1, 2021 and April 2, 2021, there were six dates, including April 2, in which the truck REYES was driving travelled in or



through Rhode Island. Those dates are February 8, February 9, February 11, March 21, March 29 and April 2.

**CONCLUSION**

20. Based on all of the foregoing, I submit that there is probable cause to believe that David REYES transported a minor in interstate commerce with the intent that the minor engage in prostitution or any criminal sexual activity, in violation of 18 U.S.C. § 2423(a).

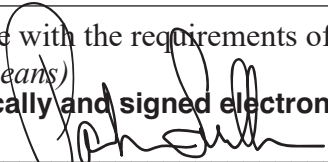


Lisa Crandall  
Special Agent  
Federal Bureau of Investigation

Attested to be the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by **Telephone**. (*specify reliable electronic means*)

**Sworn telephonically and signed electronically**

April 9, 2021  
\_\_\_\_\_  
*Date*

  
\_\_\_\_\_  
*Judge's signature*

**Providence, Rhode Island**  
\_\_\_\_\_  
*City and State*

**Patricia A. Sullivan, USMJ**  
\_\_\_\_\_  
*Printed name and title*

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. \_\_\_\_\_

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.  
 Defendant: David Romero Reyes, a/k/a David Romeo  
Adult Correctional Institute, Cranston, RI  
 Address: \_\_\_\_\_

Name of District Court, and/or Judge/Magistrate Location (City)  
 UNITED STATES DISTRICT COURT RHODE ISLAND  
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM RICHARD B. MYRUS  
 U.S. Atty  Other U.S. Agency  
 Phone No. (401) 709-5000  
 Name of Asst. U.S. Attorney John P. McAdams  
 (if assigned)

Interpreter Required Dialect: Spanish

Birth Date ██████████ 1970  Male  Alien  
 Female (if applicable)

Social Security Number ██████████

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
FBI ~ Lisa Crandall, Special Agent

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. Atty  Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County \_\_\_\_\_

**DEFENDANT**

Issue:  Warrant  Summons

Location Status:  
 Arrest Date 4/2/2021 or Date Transferred to Federal Custody \_\_\_\_\_

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): \_\_\_\_\_

FPD  CJA  RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

**OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 USC § 02423a	Transportation with intent to engage in criminal sexual activity	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 10-Life/ Fine: \$250,000	Supervised Release: Life/ Special Assessment: \$5000	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 3	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor