

Approved: SMort
SARAH MORTAZAVI
Assistant United States Attorney

Before: THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : COMPLAINT
:
- v. - : Violation of 18 U.S.C.
: §§ 2422(b) and 2
JESSE RODRIGUEZ, :
:
Defendant. : COUNTY OF OFFENSE:
: NEW YORK
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANDREW SHORE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), Special Investigations Division, and a Task Force Officer with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Attempted Enticement)

1. From at least on or about April 4, 2018 up to and including on or about July 1, 2018, in the Southern District of New York and elsewhere, JESSE RODRIGUEZ, the defendant, willfully and knowingly did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in a sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, RODRIGUEZ, in communications over the internet, attempted to persuade, induce, and entice an undercover officer posing as the mother of a 13-year-old girl and an 8-year-old girl to meet the defendant for the purpose of engaging in sexual activities with the minor girls.

(Title 18, United States Code, Sections 2422(b) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Detective with the NYPD, currently assigned to the Special Investigations Division, and a Task Force Officer with HSI. I have been a police officer with the NYPD for approximately 16 years. I have participated in numerous investigations involving crimes against children, including the receipt, possession, and/or distribution of child pornography by electronic means, sexual exploitation, and enticement of minors. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

3. I have been personally involved in the investigation of this matter, including in an undercover capacity. This affidavit is based upon my communications with JESSE RODRIGUEZ, the defendant, my review of documents and reports, and my conversations with law enforcement agents and other people. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise expressly indicated.

4. Based on my involvement in this investigation, my review of documents, and my conversations with law enforcement agents and other individuals, I have learned, among other things, the following:

a. From on or about April 4, 2018 through on or about July 1, 2018, a law enforcement agent working in an undercover capacity ("UC-1"), and posing as the mother of a thirteen-year-old child ("Minor-1") and an eight-year-old child ("Minor-2"), exchanged over a thousand messages over the social media application "PalTalk"¹ with an individual who used the username "Hockey_Guy." The messages between Hockey_Guy and UC-1, related to, among other things, arranging a meeting in New

¹ Based on my training and experience, I know that PalTalk is a social media application that can be accessed on a computer and that allows users to anonymously exchange messages, including text, pictures, and videos.

York, New York between Hockey_Guy, UC-1, Minor-1, and Minor-2 so that Hockey_Guy could engage in sexual activities with Minor-1 and Minor-2.

b. The following are excerpts of the messages exchanged between Hockey_Guy and UC-1 from on or about April 4, 2018 to on or about June 29, 2018.

Hockey_Guy	"cool, how old are your girls?"
UC-1	"8 and 13"

UC-1	"how old do you like?"
Hockey_Guy	"43" "sorry ive gone as young as 16"

Hockey_Guy	"Do you want to lick [Minor-1] or have me do it before I enter her?"
UC-1	"what would you prefer?"
Hockey_Guy	"does not matter to me.. I will be licking and eating her sometime along the way"

UC-1	"she [Minor-1] just turned 13"
Hockey_Guy	"yep" "I know"

Hockey_Guy	"yeah going to do her in. five positions" "so after taking [Minor-1's] virginitiy and being with her for awhile, then it's [Minor-2] and then you"
UC-1	"ok" "we're gonna have a great time"
Hockey_Guy	"yes we are" "will a dozen condoms be a good starting point"

c. In other messages sent to UC-1 using PalTalk, Hockey_Guy described in detail the sexual acts that he wanted to engage in with Minor-1 and Minor-2. For example, in one series of messages, Hockey_Guy wrote that he would like to have sex with Minor-1 in "cowgirl, rev cowgirl, doggy, missanary [sic]," and that he would "get [Minor-2] to do some oral as I begin to rub" [Minor-1], "get [Minor-1's] top off and lick and suck her nipples." He also stated he wanted "the girls [to] suck me" and wanted to "finger the girls." In another series of messages, Hockey_Guy wrote that he wanted to "have [Minor-1] get on her knees and do oral to me as I turn [Minor-1] upside down and do oral to her." Hockey_Guy also asked, in relation to meeting UC-1 for purposes of having sexual relations with Minor-1 and Minor-2, "Will a dozen condoms be a good starting point," and indicated that he would bring "lots of lube."

**Law Enforcement Identifies JESSE RODRIGUEZ,
the Defendant, as Hockey Guy and p j guy@yahoo.com**

5. Based on my participation in the investigation, including my conversations with other law enforcement officers and my review of emails, I have learned that after UC-1 provided an email address (the "UC-1 Email") to the user "Hockey_Guy" over Paltalk on April 18, 2018, the UC-1 Email received a message that same day from the email address "p j guy@yahoo.com," which listed the sender's name as "Jeff Vasques."

6. Based on my participation in the investigation, including my conversations with other law enforcement officers and my review of emails, I have learned that the email from "Jeff Vasques" to the UC-1 Email, "Jeff Vasques" referred to UC-1 with the same first name that UC-1 had provided to Hockey_Guy over Paltalk. "Jeff Vasques" also provided photographs of himself ("Target Photographs") in emails to UC-1, consistent with Paltalk chat conversations between UC-1 and Hockey_Guy. Over Paltalk, Hockey_Guy sent messages to UC-1 confirming receipt of his email to the UC-1 Email, writing, "it [the photo of myself] didn't attach," "hang on," "email on its way," "did you get it." Hockey_Guy also commented in Paltalk messages to UC-1 on a photograph UC-1 sent back to "Jesse Vasques" from the UC-1 email address.

7. Based on the foregoing, I believe the "Hockey_Guy" Paltalk user name, the "p j guy@yahoo.com" email address, and the "Jeff Vasques" name associated with "p j guy@yahoo.com" are all linked to the same individual.

8. Based on metadata I reviewed from one of the Target Photographs "Jesse Vasques" sent to the UC-1 email address, I learned that the image appeared to have been created by a user with the name "Jesse Rodriguez."

9. Based on information obtained pursuant to a subpoena issued to Paltalk for any and all subscriber information and IP connection logs associated with Hockey_Guy, I collected IP addresses associated with Hockey_Guy indicating a location in Minnesota and the name of the relevant Internet Service Provider ("ISP-1").

10. Based on information obtained pursuant to a subpoena issued to ISP-1 for any and all subscriber information linked to the IP addresses associated with Hockey_Guy, I have learned that "Jesse Rodriguez" is the ISP-1 subscriber registered as the user of those IP addresses.

11. Based on multiple Facebook searches conducted using personal information Hockey_Guy provided in messages to UC-1, including the fact that he was in the Air Force, as well as the location information provided from the aforementioned subpoena returns, I found a Facebook profile under the user name "Jesse.Rodriguez.77715." I recognized that the individual in the profile and other pictures associated with Facebook user "Jesse.Rodriguez.77715" appear to depict the individual pictured in the Target Photographs.

12. Based on a search of the Minnesota Division of Motor Vehicles ("DMV") database, which contains driver's license pictures of licensed drivers, I found an individual with the name "Jesse Rodriguez." From my review of the DMV photograph associated with "Jesse Rodriguez," I learned that the DMV photograph belonging to "Jesse Rodriguez" appears to depict the individual pictured in the Target Photographs.

The July 1, 2018 Meeting

13. Based on my involvement in this investigation and my review of PalTalk messages, I have learned, among other things, the following:

a. Using PalTalk, UC-1 and Hockey_Guy arranged for a meeting between UC-1 and Hockey_Guy in New York, New York, at which Hockey_Guy would engage in sexual activity with Minor-1 and Minor-2. To that end, the following are excerpts of

messages, among others, exchanged between Hockey_Guy and UC-1 on or about June 12, 2018, regarding a meeting on Sunday, July 1, 2018:

Hockey_Guy	"So, how early can I see you guys on Sunday?"
UC-1	"I guess if theyre [handcuffs] in the suitcase" "whenever you want...im not planning anything except for you"
Hockey_Guy	"Yea was going to put them [handcuffs] in the suitcase" "How early are you up?"
UC-1	"we get up at like 7" "we need to shower and eat and whatnot" "make ourselves pretty" "lol"
Hockey_Guy	"so, 9"

b. In other messages sent to UC-1 using Paltalk, Hockey_Guy discussed the logistics of a planned meeting on Sunday, July 1, 2018, including writing on or about June 25, 2018, "did you find a place to meet Sunday morning," "kinda need a address dear," "I don't see anything that will cause me to not come out there." UC-1 sent Hockey_Guy an address for a coffee shop in New York, New York ("Coffee Shop-1") where UC-1 would meet Hockey_Guy on Sunday, July 1, 2018.

c. In emails sent from "p j guy@yahoo.com" to UC-1 on June 30, 2018, "p j guy@yahoo.com" wrote to UC-1, "24 hours till I see you...God I can't wait," "Tell the girls they have to get to bed early and get lot's [sic] of rest. Tomorrow is the big day Sleep good see you in the morning," "Just 16 hours to go." On July 1, 2018, a few hours prior to the scheduled meeting, "p j guy@yahoo.com" wrote, "Any chance we can

meet earlier," and "Are you up and getting ready? Can't wait to hold you in my arms. Let's get this party started..lol See you soon."

14. Based on my participation in this investigation, I have learned that on July 1, 2018, at approximately 8:50 a.m., JESSE RODRIGUEZ, the defendant, went to Coffee Shop-1. Law enforcement agents arrived at the location, identified RODRIGUEZ based on the Target Photographs, followed RODRIGUEZ to a second location, and placed RODRIGUEZ under arrest. Based on the messages described in paragraph 13, *supra*, I believe that RODRIGUEZ arrived at Coffee Shop-1 with the intent to meet with UC-1, posing as the mother of Minor-1 and Minor-2, and engage in sexual activity with Minor-1 and Minor-2.

15. Based on my participation in this investigation, I have learned that law enforcement agents searched JESSE RODRIGUEZ, the defendant, incident to arrest. Among other things, law enforcement agents recovered a box of condoms, two bottles of lubricant, rubber gloves, a 35 mm camera, physical restraints, and prescription Sildenafil pills, which I know to be a generic form of the Viagra drug.

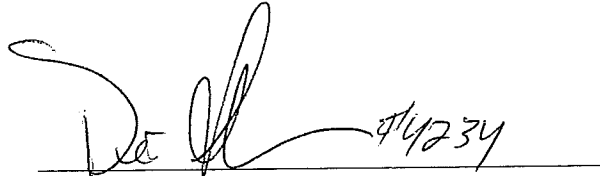
16. Based on my participation in this investigation, I have learned that law enforcement agents advised JESSE RODRIGUEZ, the defendant, of his *Miranda* rights. He thereafter waived those rights and agreed to speak to law enforcement. RODRIGUEZ stated the following in substance and in part:

a. RODRIGUEZ admitted that he is the user associated with username "Hockey_Guy" and had used this username on Paltalk to chat with UC-1, who was posing as the mother of two minor girls.

b. RODRIGUEZ sent sexually explicit chat messages to UC-1 via Paltalk indicating that he wanted to engage in sexual activity with the minors.

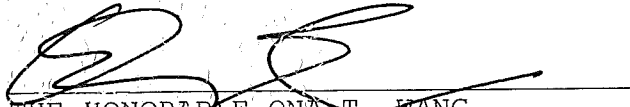
c. RODRIGUEZ had arranged to meet with UC-1 with the intent to engage in sexual activities with Minor-1 and Minor-2.

WHEREFORE, the deponent respectfully requests that JESSE RODRIGUEZ, the defendant, be imprisoned or bailed, as the case may be.



Andrew Shore
Task Force Officer
Homeland Security Investigations
Department of Homeland Security

Sworn to before me this
2nd day of July, 2018



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK