

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the District of Colorado

United States of America)

v.)

Yaron Segal)

Defendant)

Case No. 12-mj-00024-GJR

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 of 03/28/2012 in the county of Mesa in the District of Colorado, the defendant violated Title 18 U. S. C. § 2423(b) and 2241(c)

, an offense described as follows:

the defendant did willfully travel in interstate commerce for the purpose of engaging in a sexual act with an individual under the age of 16 years old and for the purpose of engaging in a sexual act with an individual less than 12 years old, all in violation of Title 18 United States Code, Sections 2423(b) and 2241(c).

This criminal complaint is based on these facts:

See Affidavit attached hereto and herein incorporated by reference

Continued on the attached sheet.

Complainant's signature

Vanessa Hipps, Special Agent, DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: March 29 2012

Judge's signature

Gudrun J. Rice - Magistrate Judge

Printed name and title

City and state: Grand Junction, Colorado

AFFIDAVIT

I, Vanessa Hipps, first being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) of U.S. Immigration and Customs Enforcement (ICE)-Homeland Security Investigation, assigned to the Resident Agency office in Glenwood Springs, Colorado, and have been employed by HSI since July 2009. Prior to July 2009, I was employed by ICE in their Enforcement and Removal Operations division for over two (2) years. I have a Bachelor of Science degree in Political Science/Criminal Justice, a Master's of Science degree in Homeland Security Administration and successfully completed the Criminal Investigator Training Program and ICE Special Agent Training at the Federal Law Enforcement Training Center in Glynco, Georgia. As a Special Agent, I am responsible for enforcing federal criminal statutes including the sexual exploitation of children, pursuant to Title 18, United States Code, Sections 2423(b) and 2241(c). I have received training and actual experience relating to Federal Criminal Procedures, Federal Statutes and ICE Regulations. I have received training and instruction in the field of investigation of child pornography and exploitation and have had the opportunity to conduct, coordinate and participate in investigations relating to the sexual exploitation of children. This includes, but is not limited to, conducting undercover investigations via Internet Relay Chat (IRC) in regard to individuals who express an interest in traveling with intent to engage in a sexual relationship with a minor.
2. This affidavit is submitted for the purpose of establishing probable cause in support of a complaint and warrant to arrest Yaron Segal, year of birth 1981, a Israeli Citizen and

National, living in Massachusetts, United States, for violations of Title 18, United States Code, Section 2423(b) and 2241(c), knowingly traveling within interstate commerce for the purposes of engaging in a sexual act with an individual under 16 years old and for the purpose of engaging in a sexual act with an individual less than 12 years of age. This affidavit is prepared for the purpose of establishing probable cause, and does not contain every fact known to me. Further, it is based on my personal knowledge and information provided to me by other law enforcement officers, citizens, and employees of the Department of Homeland Security.

Facts of the Case

3. On February 02, 2012, I was chatting via Internet Relay Chat (IRC) in an undercover (UC) capacity utilizing a UC persona. During the chat, a suspect, utilizing the screen name "lombozi" started chatting with the UC persona. "lombozi" was in channels called "#0!!!!!!childslavesex" and "#0!!!!!!ChildRapeTortureBrutality." During the chat, we exchanged some personal information, and I indicated that I had two children, one under the age of sixteen (16) years old and one under the age of twelve (12) years old. The suspect immediately turned the conversation to sex, and indicated that he wanted to have sexual intercourse with the UC persona and both of her children.
4. On February 2, 2012, an email was also received from "lombozi" to the UC persona's email account. The email came from account ruthlessmale@hotmail.com.
5. In the second chat on February 11, 2012, he also indicated his willingness to travel to Colorado from Massachusetts to meet with the UC persona for the purpose of sexual

intercourse with the UC persona and her children stating, "i could definitely drop by for a weekend...."

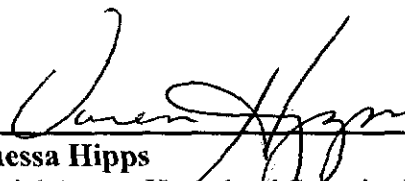
6. Beginning February 2, 2012, and over the next couple months, the suspect continued to chat via IRC, email, text and Yahoo Chat with the UC persona about sexual intercourse with the persona and her children. A majority of the chats were very sexually explicit.
7. The suspect also sent several photos of a man he indicated to be himself via his email account during the month of February. One photo was of a naked man lying on a bed, one was of the unclothed torso of a man, and two were of his face.
8. On February 17, 2012, he emailed a video of a man, naked from torso to mid-thigh, masturbating himself until he ejaculated. He indicated in the email that this was a video of himself. The video was two minutes and one second long.
9. On February 18, 2012, he emailed a \$100 Amazon gift card and indicated that he wanted the UC persona to utilize it to obtain a phone for communication with him. This gift card was returned to him via email.
10. On February 18, 2012, via IRC chat, he gave the UC persona his telephone number so that the UC persona could contact him. This was done again on February 28, 2012, via IRC chat. On February 29, 2012, communication via phone texts began between suspect and the UC persona. On this day, he indicated that his real name was "Ron."
11. In emails on February 21st and 22nd, 2012, he indicated that he would use the gift card to purchase a dildo. He included in the email links to some Amazon web pages advertising a strap-on dildo and vibrator and indicated the children he wanted to buy them for. In these

emails, he also indicated the time he wanted to travel, "hoping maybe I could come over at the end of March."

12. On March 06, 2012, via Yahoo chat, he provided to website links to Amazon advertisements for a dildo and vibrator and indicated they were for the UC persona. The UC persona provided a link to strap-on dildo on another web page and he indicated later that he ordered that one as well.
13. On March 07, 2012, a Department of Homeland Security summons was sent to Microsoft Online Services for the email account of ruthlessmale@hotmail.com. Another Department of Homeland Security summons was sent to Comcast Communications for IP address 71.206.14.226, which was utilized during an IRC chat on February 18, 2012.
14. On March 10, 2012, February 12, 2012, "Ron" made a telephone call to the UC persona's cell phone, believing that he was speaking to her and her two children. During this conversation, there was discussion of a desire to travel to meet for sexual intercourse with the UC Persona and her two children. He also indicated that he was going to bring along the sexual devices he ordered, including a dildo, small vibrator for the youngest child, and a strap-on dildo and that he would book his flight to Colorado. He also indicated that he was originally from Israel when questioned about why he spoke with an accent.
15. On March 14, 2012, via email, he sent information indicating the flight that he had booked. According to the email, he indicated that he would arrive in Grand Junction, CO on Wednesday, March 28, 2012, at approximately 7:25pm.

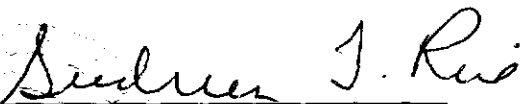
16. On March 14, 2012, Microsoft Online Services returned information about the email account ruthlessmale@hotmail.com. IP information indicated the account was opened in New Haven, Connecticut and was recently used in Cambridge, Massachusetts. During chats, "Ron" indicated he lived in Connecticut for some time and was now residing in the Boston area.
17. On March 14, 2012, utilizing available databases, I was able to ascertain the true and complete identity of "Ron" as Yaron Segal, born in 1981, a citizen and national of Israel and a resident of Massachusetts, United States.
18. On March 16, 2012, he sent an email with a photo attachment of the sexual items he earlier indicated he purchased from Amazon, stating "Got the toys....those are some big cocks."
19. On March 18, 2012, he sent an email with two photo attachments. The first photo was of a dildo lying next to a naked penis and the second photo was of the same dildo in a man's mouth. The dildo in the photos was the same as one in the photo from March 16, 2012.
20. On March 28, 2012, acting as my UC persona, I met with Segal in the baggage claim area of the Grand Junction Airport. Segal appeared to be the same man as in the two photographs sent to the UC persona on February 11, 2012 and February 29, 2012.

21. Wherefore, your affiant respectfully requests that this Court issue a felony complaint and arrest warrant for Yaron Segal.



Vanessa Hipps
Special Agent, Homeland Security Investigations
Department of Homeland Security

Subscribed and sworn to before me this 29th day of March, 2012.



GUDRUN J. RICE
United States Magistrate Judge
District of Colorado