

UNITED STATES OF AMERICA

v.

ANGAD BEHARRY and
GISAINET CRISTINA CHIRINOS
VILORIA,
a/k/a "Gisainet Christina Hernandez,"

Defendants.

COMPLAINT

24 Mag. 315

Violations of 18 U.S.C. §§ 2251(a)
and (e); 2252A(a)(5)(B) and (b)(2)

COUNTIES OF OFFENSES:
WESTCHESTER and NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

JONATHAN HUTCHINSON, being duly sworn, deposes and says that he is a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE
(Sexual Exploitation of a Child)

1. From at least on or about August 31, 2022 through at least on or about September 3, 2022, in the Southern District of New York and elsewhere, ANGAD BEHARRY and GISAINET CRISTINA CHIRINOS VILORIA, a/k/a "Gisainet Cristina Hernandez," the defendants, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, and attempted and conspired to do so, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, BEHARRY and CHIRINOS VILORIA attempted and conspired to induce a female minor to engage in sexually explicit conduct, and to take sexually explicit photographs and videos of the minor and transmit them over the Internet to BEHARRY, located in the Southern District of New York.

(Title 18, United States Code, Section 2251(a) and (e).)

COUNT TWO
(Possession of Child Pornography)

2. From at least in or about April 23, 2022 to June 20, 2023, in the Southern District of New York and elsewhere, ANGAD BEHARRY, the defendant, knowingly possessed and accessed with intent to view a book, magazine, periodical, film, videotape, computer disk, and

other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, BEHARRY possessed sexually explicit videos and images of minors, including prepubescent minors and minors under the age of 12, in the Southern District of New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2))

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

3. I have been a Special Agent with HSI since April 2017. I have participated in numerous investigations involving the sexual exploitation of children, in violation of Title 18, United States Code, Sections 2251, 2252A, and 2422(b), among other offenses. I have gained expertise in the conduct of such investigations through, among other things, training in seminars, classes, and everyday work related to conducting these types of investigations.

4. I have been personally involved in the investigation of this matter, and I am familiar with the information contained in this Complaint based on my own personal participation in the investigation, my review of documents and records, conversations I have had with other law enforcement officers about this matter, my training and experience, and numerous discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. Because this Complaint 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.

Definitions

5. The following terms have the indicated meaning in this Complaint:

a. The terms “minor,” “sexually explicit conduct,” and “visual depiction,” as used herein, are defined as set forth in Title 18, United States Code, Section 2256.

b. The term “child pornography,” as used herein, is a visual depiction of a minor involved in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(8).

c. “Computer” means an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device. *See* 18 U.S.C. § 1030(e)(1).

d. An Internet Protocol (“IP”) address is a unique numeric address used to identify a particular computer connected to the Internet. An IP address looks like a series of

numbers separated by periods. Every computer connected to the Internet must be assigned an IP address so that communications from or directed to that computer are routed properly.

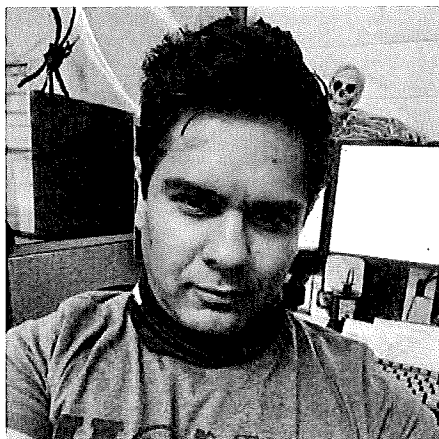
6. Based on my involvement in this investigation, my review of post-arrest interview notes, reports, videos, other records, and my conversations with other HSI agents and Colombian National Police (“CNP”) officers, I am aware of the following:

a. In or about October 2022, the HSI Attaché in Bogotá, Colombia, in coordination with the HSI Transnational Criminal Investigative Unit of the CNP, rescued a one-year-old female (the “Female Infant”) who had been exploited in Medellín, Colombia. The investigation leading up to the rescue revealed that the mother of the Female Infant (the “Mother”)¹ had produced child sexual abuse material (“CSAM”) of the Female Infant and distributed it via social media platforms.

b. The Mother was arrested and following her arrest, she participated in an interview with law enforcement (the “Interview”).

c. During the Interview, the Mother stated, in substance and in part, that in or about March 2022, her friend introduced her to an American who sent people a lot of money. The Mother stated that the American who she communicated with was named “Angad Beharry,” and that she began communicating with him via a Facebook account in the name of “Angad Beharry.”

d. During the Interview, a CNP officer searched “Angad Beharry” on Facebook, identified a publicly-available profile with that name, and showed that profile to the Mother. The Mother identified the profile as the “Angad Beharry” profile she had communicated with on Facebook (the “Beharry Facebook Profile”); in particular, the Mother recognized the below photograph as one of the profile pictures on the account she had communicated with:



¹ This Complaint does not directly charge BEHARRY with criminal conduct related to the Mother. Rather, information in this Complaint regarding the Mother and BEHARRY’s communications are relevant to the charges contained herein.

e. The Mother stated that through her Facebook discussions with BEHARRY, she learned that BEHARRY was a police officer living in the United States.

f. The Mother stated that through her Facebook discussions with BEHARRY, she learned that BEHARRY visited Bogotá and Medellín often for vacation.

g. The Mother also stated that her conversation with BEHARRY moved from Facebook to Telegram Messenger (“Telegram”), an encrypted messaging application.

h. The Mother stated that initially, BEHARRY asked her for a sexually explicit video involving non-minors, which she sent to BEHARRY. In return, BEHARRY sent the Mother \$30 on PayPal. According to the Mother, BEHARRY sent the payment to an account in the name of “Alex Clavijo.”

i. However, the Mother explained, after she told BEHARRY that she had a child (*i.e.*, the Female Infant), BEHARRY asked the Mother for sexually explicit material depicting sexual acts between the Female Infant and the Mother, as well as sexual acts between the Female Infant and dogs. Specifically, the Mother stated that BEHARRY asked her to record a video of, among other things, the Mother kissing the Female Infant’s vagina and vice-versa. The Mother reported that BEHARRY stated he wanted the material to masturbate to it and that he had a fetish.

j. The Mother stated that she recorded multiple videos of herself sexually abusing the Female Infant—including, specifically, a video of the Mother with her mouth on the Female Infant’s vagina (the “Female Infant Video”), which she sent to BEHARRY via Telegram. In exchange, the Mother said, BEHARRY sent her \$600 in two installments to a Paypal account in the name “Yamile Serna Piedrahita.”

k. The Mother stated that BEHARRY asked her for help finding other individuals who would create sexual content involving minors or dogs.

l. On or about April 11, 2023, the Mother was convicted of pornography with minors, acts and carnal access, aggravated abuse with a minor under 14 years of age, and use or facilitation of means to offer sexual services with minors, by Criminal Court 3 of the municipality of Bello Antioquia, Colombia, and was sentenced to approximately 21 years in prison.

7. Based on my review of law enforcement documents and conversations with other law enforcement officers, I have learned that BEHARRY is a police officer who is currently a member of the New York Police Department (“NYPD”) Counterterrorism Bureau’s Critical Response Command with Badge No. 10301.

8. Based on my review and comparison of images depicting of BEHARRY in his NYPD personnel file, on his New York State driver’s license, and on his US Passport, I am aware that the photograph in paragraph 6(d) depicts ANGAD BEHARRY, the defendant.

9. Based on my conversations with other law enforcement officers and review of reports, documents, and other records, including a CNP report documenting the search of the Mother's cellphone, I am aware that the CNP obtained a search warrant for the Mother's cellphone and found the following stored on the Mother's cellphone:

a. Approximately 27 videos containing CSAM of the Mother sexually abusing the Female Infant, including the Infant Video;

b. A Chat in the Telegram application with a user named "Angad."

c. Folders in the Telegram app containing images associated with the Mother's contacts in Telegram, including a folder labeled "427" containing the below photograph, which I know—based on my review of the items listed in paragraph 8—is a picture of ANGAD BEHARRY:



d. A contact list (the "Contact List") containing several entries for an individual name "Angad Beharry"—one of which was listed as associated with a particular phone number ending in -0873 (the "0873 Number") and another which was listed as associated with Facebook user ID number 1349154016.

10. Based on my review of information provided by AT&T, I am aware that the 0873 Phone Number is subscribed to "Angad A Beharry" and has been active since on or about September 22, 2018. In addition, the billing address associated with the subscriber's account is a particular residential address located in Yonkers, New York (the "Yonkers Address").

11. Based on my review of information provided by Meta Platforms, Inc., I am aware that the Facebook account linked to user ID number 1349154016 is registered in the name "Angad Beharry" with the 0873 Number, and is also associated with IP address 68.192.249.69 (the "68 IP Address").

12. Based on my review of information provided by CSC Holdings, LLC, I am aware of the following:

a. The subscriber for the 68 IP Address is a close relative of BEHARRY's and the service address for the account is the Yonkers Address.

b. The 68 IP Address was used to access the internet on, among other dates, April 3, 2022.

13. Based on my review of subscriber information and a transaction log provided by PayPal, I am aware of the following:

a. There is a PayPal account registered in the name of "Angad Beharry," the 0873 Number, the Yonkers Address, and the email address blueknight10301@yahoo.com (the "PayPal Account 1").²

b. On or about March 23, 2022, \$50 was sent from the PayPal Account 1 to an account in the name of "Alex Clavijo" (*i.e.*, an account the Mother said that BEHARRY sent money to in exchange for sexually explicit material, *see supra* ¶ 6(h)).

c. On or about April 3, 2022 at approximately 5:26 a.m. (ET) and April 4, 2022, payments of \$300 each (totaling \$600) were sent from PayPal Account 1 to an account in the name of "Yamile Serna Piedrahita" (*i.e.*, the account the Mother said that BEHARRY sent money to in exchange for the Infant Video, *see infra* ¶ 6(j)).

d. PayPal Account 1 was accessed from the 68 IP Address on or about April 3, 2022 at approximately 5:26 a.m. E.T.

WhatsApp Correspondence Between BEHARRY and CHIRINOS VILORIA

14. Based on my review of information provided by Apple Inc., I am aware that an iCloud Account is registered in the name "Angad Beharry" to the 0837 Number and Yonkers Address (the "iCloud Account").

15. Based on my review of data from the iCloud Account, including the videos and images described below, I am aware that the iCloud Account contained a message conversation on the WhatsApp application between (1) a WhatsApp account with the username "Gad" associated with the 0873 Number ("Gad") and (2) a WhatsApp user named "Gisainet Cristina Hernandez" ("Hernandez"). This conversation took place between on or about August 31, 2022 and September 12, 2022 and in this conversation, "Gad" asked "Hernandez" to take explicit photographs of a female child to whom she appeared acquainted in some way (the "Victim"), including "her pussy, her anus, her tits, everything"; "Gad" and "Hernandez" discussed a transfer of \$130 to "Hernandez" so that she can buy a toy for the Victim; and "Gad" requested that "Hernandez" teach the Victim "how to masturbate." For example:

a. On or about August 31, 2022 at approximately 8:18 p.m., "Hernandez" sent "Gad" an image of the Victim sitting on a bed with no pants and stated "I'm with the nine-

² As explained above, "10301" is BEHARRY's NYPD badge number.

year-old girl.” “Gad” asked “Is she naked?” and said “I want to see it closer. I want to see all of her body.” A few minutes later, “Gad” said “I want to see her panty, her pussy, her anus, her tits, everything” and later texted “I like being able to see between her legs and under her dress.” “Hernandez” responded “tomorrow I will be able to take better photos.”

b. The next day, September 1, 2022, at approximately, 1:21 a.m., “Gad” texted “How much do you need for everything?” “Hernandez” responded “120[.]” After discussion about the price, “Gad” said “\$130 for everything? To which PayPal account?” “Hernandez” responded “Gisainet_10@outlook.es[.]” “Gad” replied “It’s been sent.”

c. A few minutes later, “Gad” texted “What do you plan to do with the girl? What is her name? Will you teach her how to masturbate? You can make a video where you teach her how to masturbate.” “Hernandez” responded “tomorrow I will tell her remember that she is a girl but she is big.” “Gad” later asked for the “girl’s name”—to which “Hernandez” responded with a particular name.

d. On or about September 1, 2022 at approximately 11:40 p.m., “Hernandez” sent the following images and videos to “Gad” depicting the Victim, who, based on my training and experience, appears to be a prepubescent female and who, based on the messages described in paragraph 15(a), I believe to be nine-years-old:

i. [ff3ae997-4b96-4b99-ae2f-4ea45d4e65ad.jpg](#) (“WhatsApp Item 1”), which depicts the Victim standing in a tiled shower with her bare back and buttocks facing the camera.

ii. [eb5da925-dfba-4f23-a502-b8475fcea27e.mp4](#) (“WhatsApp Item 2”), a one-second video depicting the Victim standing in a tiled shower with her bare back and buttocks facing the camera.

iii. [40b40d3d-7cab-40a0-87f9-8ea68a70b8af.jpg](#) (“WhatsApp Item 3”), which depicts the Victim’s naked torso, while the Victim is standing in the threshold of a tiled shower facing the camera.

iv. [b8665ff2-9568-4435-872f-1a0305f1f02c.jpg](#) (“WhatsApp Item 4”), which depicts the Victim standing nude in the threshold of a tiled shower with both arms raised and her mouth open. The Victim’s nude body is visible from her feet to her forehead.

v. [64425778-302e-492d-9c02-6a73f62c4358.mp4](#) (“WhatsApp Item 5”), a ten-second video depicting the Victim standing nude in the threshold of a tiled shower touching her genitals with her left hand. The camera is zoomed in on the Victim’s genitals for the first two seconds of the video, after which the camera zooms out and captures the Victim’s jumping up and down.

e. Immediately after sending this material to “Gad,” “Hernandez” stated “Did not let itself be recorded very well” and “Tomorrow I try to record it,” among other things.

“Gad” responded, among other messages, “She has a pretty pussy” and “I want to taste her pussy.”

f. On or about September 3, 2022 at 10:04 p.m., “Hernandez” sent “Gad” multiple images of the Victim naked in a shower. Specifically, “Hernandez” sent the following:

i. b8df4798-146c-4446-8e91-a01c177369b2.jpg (“WhatsApp Item 6”) depicting the naked buttocks of a female standing in a tiled shower.

ii. 669d6817-9d39-4963-a5cf-520910feefb9.jpg (“WhatsApp Item 7”), depicting the Victim standing nude facing the camera in a tiled shower. The Victim’s entire nude body is visible.

iii. 54b36263-5f36-41ea-9ed7-f2492bd2c60f.jpg (“WhatsApp Item 8”), depicting the naked buttocks of a female standing in a tiled shower.

iv. The individual depicted in WhatsApp Items 6 through 8 appears to be the Victim in WhatsApp Items 1 through 5 given the proximity in time in which the material was sent to BEHARRY, the location where the images were taken (*i.e.*, the tiled shower) and the appearance of the Victim.

g. On or about September 10, 2022 through on or about September 12, 2022, “Gad” sent an image of an individual I recognize as BEHARRY, the defendant, wearing a tag on his shirt bearing the words “BEHARRY 10301.” “Gad” also asked “Hernandez” “[d]o you want to show me your daughter’s pussy and ass?” “Hernandez” responded “I have no data” “and you know that my daughter is apart[.]”

16. Based on information provided by AT&T Corporation, I am aware that the cellphone assigned the 0873 Number was located at or near cellphone towers located in the following areas at the following dates and times:

a. August 31, 2022 at approximately 8:19 p.m.: Randall’s Island, New York County, New York (*i.e.*, a minute after “Hernandez” sent a message to “Gad” about being with a nine-year-old girl);

b. September 1, 2022 at approximately 11:42 p.m.: Randall’s Island, New York County, New York (*i.e.*, when “Hernandez” sent “Gad” WhatsApp Items 1 through 5);

c. September 3, 2022 at approximately 10:21 p.m.: Yonkers, New York (*i.e.*, approximately fifteen minutes after “Hernandez” sent “Gad” WhatsApp Items 6 through 8)

17. Based on my participation in an interview of the Mother that occurred on or about April 19, 2023 in Medellín, Colombia, my discussion with other law enforcement officers also present at the interview, and my review of notes from the interview, I am aware of the following:

a. The Mother stated that she had a friend in Venezuela called “Gisainet” who she believed was in communication with BEHARRY.

b. She further stated that “Gisainet” was 19 years old and provided the month and day of “Gisainet’s” birthdate, as well as a phone number for “Gisainet.”

18. Based on my discussions with an HSI Country Representative based in Bogotá, Colombia, I have learned that on or about April 20, 2023, law enforcement contacted “Gisainet” via the WhatsApp messaging application at the “Gisainet” phone number provided by the Mother. The WhatsApp profile image for the “Gisainet” phone number showed a female with two tattoos of black butterflies on her left shoulder.

19. Based on my query of a government database on or about October 18, 2023, and my review of arrest records, I am aware that an individual named GISAINET CRISTINA CHIRINOS VILORIA was arrested by U.S. Border Patrol (“Border Patrol”) agents on or about September 1, 2023 for attempting to enter the United States without inspection. Border Patrol arrest records list CHIRINOS VILORIA’s date of birth.

20. CHIRINOS VILORIA’s date of birth on the arrest records is consistent with the information the Mother provided about her friend “Gisainet” who she believed had communicated with BEHARRY; the month and date matched that provided by the Mother, and the birth year on the arrest records—2002—is consistent with CHIRINOS VILORIA being 19 years old when the Mother provided the information.

21. The Border Patrol arrest records contain a photograph of CHIRINOS VILORIA. Based on open-source research, I located a Facebook profile for an individual named “Gisainet Hernandez.” That Facebook profile included multiple images of a female with two tattoos of black butterflies on her left shoulder, who I recognize as CHIRINOS VILORIA from her arrest record photograph.

22. In addition, based on my review of the WhatsApp messages between “Gad” and “Hernandez,” I am aware that “Hernandez” sent multiple photographs to “Gad” of a female individual with two tattoos of black butterflies on her left shoulder, including photographs of the female individual’s face. Based on my review of CHIRINOS VILORIA’s arrest photograph, I recognize the individual in the photographs sent by “Hernandez” to be CHIRINOS VILORIA.

iCloud Account Videos

23. Based upon information learned from a judicially authorized search warrant executed on the iCloud Account on or about June 20, 2023, I am aware that the iCloud Account contained approximately 17 images and 24 videos depicting what appear to be children engaged in sexually explicit activity, including children who I believe, based on my training and experience, are under the age of 12. These files include:

a. 16507482945032700001650750134356423000_content.mp4 (“iCloud Item 1”): An approximately four-minute long video that displays the text “Hmm Cumpilation” at

the start of the video. The video depicts approximately nine sexually explicit scenes, including the following:

i. A male's erect penis is inserted into the mouth of a prepubescent female child laying on her back and stroking the erect penis. The male ejaculates into the mouth of the female child and the erect penis is removed while the female child opens her mouth, revealing the ejaculate inside.

ii. An adult male kneels over the chest of a prepubescent female child laying down with his erect penis pointing toward her face. The female child strokes the erect penis of the adult male with her hand until he ejaculates onto her face while the female child attempts to cover her eyes. The adult male grabs the female child's hand and moves it above her head on the bed. The adult male then pushes his erect penis into the mouth of the female child and moves it back and forth.

iii. An adult male kneels on top of the waist a prepubescent female child while the prepubescent female child lays on her back. The female child strokes the erect penis of the adult male who ejaculates onto her face and chest.

iv. An adult male kneels on top of a laying down prepubescent female child with his erect penis pointing toward her open mouth. The adult male strokes his erect penis with his hand until he ejaculates into the open mouth of the female child. The adult male places his right hand on top of the head of the female child and turns her head to face the camera, as the female child opens her mouth and ejaculate drips down her face.

b. [16507482945022550001650750090410700000_content.mp4](#) (“iCloud Item 2”): This video, approximately 5 minutes and 44 seconds in length, depicts—among other things—a prepubescent female child with her mouth on the erect penis of an adult male. Later in the video, the female child's mouth is on the erect penis of an adult male. Even later, the adult male's erect penis is inserted into the vagina of the female child. The adult male touches the genitals of the female child and then places his hands on the chest of the female child and moves her up and down, while his erect penis remains in her vagina. Then, an adult male's erect penis is inserted into the female child's anus.

c. [16552201012295570001655247918927315000_content.mp4](#) (“iCloud Item 3”): This approximately two-minute video depicts a male's erect penis in the mouth of a prepubescent female child, who is standing in front of a bed wearing only white underwear. The male then inserts his erect penis in the vagina of the female child. A short time later, the female child puts her mouth on the male's erect penis.

d. [16552201012308740001655247910821650000_content.wmv](#) (“iCloud Item 4” and together with iCloud Items 1 through 4, the “iCloud Account Videos”): This approximately ten-minute video depicts a prepubescent female child sitting in the back of a vehicle with black seats naked from the waist up, stroking the erect penis of an adult male. The male then inserts his erect penis into the female child's vagina and ejaculates onto her stomach.

24. Based on my review of metadata associated with the iCloud Account Videos, I am aware of the following:

a. iCloud Item 1 was uploaded and/or last modified on the iCloud Account on or about April 23, 2022.

b. iCloud Item 2 was uploaded and/or last modified on the iCloud Account on or about April 23, 2022.

c. iCloud Item 3 was uploaded and/or last modified on the iCloud Account on or about June 14, 2022.


d. iCloud Item 4 was uploaded and/or last modified on the iCloud Account on or about June 14, 2022.

25. Based on my review of information provided by AT&T Corporation, I am aware that the cellphone assigned the 0873 Number was located at or near cellphone towers in the following locations at the following dates and times:


a. April 23, 2022 between approximately 6:11 a.m. and 5:49 p.m.: Yonkers, New York; and

b. June 14, 2022 between approximately 9:58 a.m. and 7:05 p.m.: Yonkers, New York.

WHEREFORE, the deponent respectfully requests that ANGAD BEHARRY and GISAINET CRISTINA CHIRINOS VILORIA, a/k/a "Gisainet Christina Hernandez," the defendants, be imprisoned or bailed, as the case may be.


JONATHAN HUTCHINSON
Special Agent
Department of Homeland Security –
Homeland Security Investigations

Sworn to me this 24th day of January, 2024.


THE HONORABLE JUDITH C. McCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK