

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America

v.

Vincent Sarikey

Case No.

1:23-mj-00271

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 February 20, 2009 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

Code Section

18 U.S.C. § 2251(a) and (e)

Offense Description

Sexual Exploitation of a Child and Attempt and Conspiracy

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

/s/ Elizabeth Carlson

Complainant's signature

SA Elizabeth Carlson, FBI

Printed name and title

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

Date: 4/19/23City and state: Indianapolis, Indiana

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Elizabeth M. Carlson, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

1. **Affiant:** I am a Special Agent with the Federal Bureau of Investigation and have been for approximately twelve years. I have been assigned to the Indianapolis Field Office since my graduation from the FBI Academy. I am currently assigned to the Violent Crimes Against Children Task Force, where I have investigated federal criminal violations related to child exploitation, child pornography, juvenile prostitution, commercial sex trafficking and human trafficking. I have been involved in seizures and investigations relating to victims who were threatened, forced, coerced and enticed into performing sex acts. I have participated in the execution of search warrants and seized evidence related to the offenses of human trafficking and child exploitation. I am a Law Enforcement Officer of the United States, and I am empowered to conduct investigations, execute warrants, and to make arrests for offenses committed against the United States enumerated in, but not limited to, Title 18 of the United States Code and Title 42 of the United States Code.

2. **Information provided:** The statements in this affidavit are based on information obtained from my observations, my training, and my investigation, as well as information learned from other law enforcement officers, including agents from the Washington Field Office (“WFO”) of the FBI, and other witnesses. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, I have not included each and every fact known to

the investigators concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that Vincent Sarikey (“SARIKEY”) committed criminal offenses.

3. **Probable Cause:** For the reasons listed below, there is probable cause to believe that Vincent SARIKEY, DOB xx-xx-1988 (known to Affiant, but redacted) has committed the following offense in the Southern District of Indiana and elsewhere: Sexual Exploitation of a Child (and Attempt): Beginning on a date unknown but as early as in or around February 20, 2009, ending on a date unknown but at least as late as May of 2010, within the Southern District of Indiana, in the Indianapolis area, SARIKEY sexually exploited Minor Victim 1, a child who is less than 10 years of age, by using the minor or attempting to use the minor to create visual depictions of Minor Victim 1 in sexually explicit conduct, using materials that travelled in interstate or foreign commerce, and aided and abetted others in so doing, in violation of 18 U.S.C. § 2251(a) and (e).

4. **Statutory authority: Sexual Exploitation of a Child and Attempt and Conspiracy (18 U.S.C. § 2251(a) and (e)):** This statute provides that “Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such

conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.” It is also a crime to attempt or conspire to violate this section. 18 U.S.C. § 2251(e).

5. **Definitions:** The following definitions apply to this Affidavit:

A. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

B. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

C. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image,

and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

6. Signal

A. Signal is an encrypted messages service for instant messaging, voice, and video calls. The instant messaging function includes sending text, voice notes, images, videos, and other files. Communication may be one-to-one between users, or for group messaging. The official Android app generally uses the proprietary Google Play Services, although it is designed to work without them. Signal is also distributed for iOS and desktop programs for Windows, macOS, and Linux. Signal uses mobile telephone numbers as identifier for users. It secures all communications with end-to-end encryption. The client software includes mechanisms by which users can independently verify the identity of their contacts and the integrity of the data channel.

INVESTIGATION OF VINCENT SARIKEY

7. **Overview:** This case began when a search was executed at the Virginia residence of Vincent SARIKEY during a child exploitation investigation. Devices were seized from SARIKEY. The evidence recovered from the devices showed that SARIKEY sexually exploited a minor female, Minor Victim 1 (identity known to Your Affiant), and he received sexually explicit visual depictions of Minor Victim 1 from his then girlfriend, Witness 1 (identity known to Your Affiant).

A. On or about October 14, 2022, WFO FBI executed a federal

search warrant at SARIKEY's residence located in Herndon, Virginia as part of an investigation into child exploitation. Several electronic devices were seized pursuant to the search warrant. A forensic review of SARIKEY's digital devices showed that SARIKEY possessed sexually explicit images and videos of Minor Victim 1, SARIKEY, and Witness 1 engaging in sexually explicit activity.

B. SARIKEY resided in the Southern District of Indiana from 2007 to 2010. Witness 1 was known to have resided in Southern District of Indiana during the timeframe of 2007 to 2010. SARIKEY dated Witness 1 from 2007 to 2011.

C. Minor Victim 1 is a family member of Witness 1. Based on information obtained through the WFO FBI investigation, interviews, and a review of data from digital devices, Your Affiant learned SARIKEY used Minor Victim 1 to engage in sexually explicit conduct for the purpose of creating a visual depiction of that conduct, while Minor Victim 1 resided within the Southern District of Indiana. Specifically, the visual depictions of Minor Victim 1 were produced, transmitted, and stored using devices that were not manufactured or contain parts that were not manufactured in the State of Indiana, and, therefore, travelled in interstate and foreign commerce.

8. **Interview of Witness 2:** After the search warrant was executed at SARIKEY's residence, an individual known as Witness 2 (identity known to Your

Affiant) was interviewed on or about November 22, 2023. During the interview, Witness 2 disclosed the following:

- A. Witness 2 has known SARIKEY for approximately 25 years.
- B. Witness 2 distanced herself from SARIKEY within the last year, after SARIKEY told Witness 2 he "had unhealthy urges towards underage girls". SARIKEY, however, told Witness 2 he was "not acting on it."
- C. Witness 2 recalled an incident years ago concerning SARIKEY and a person who Witness 2 believed was a female relative of SARIKEY'S ex-girlfriend, Witness 1. Witness 2 believed the female relative of Witness 1 was three or four years old at the time of the SARIKEY's conduct. Witness 2 believed the female relative of Witness 1 made an accusation to a therapist, who then reported the conduct to the authorities because the therapist was a mandated reporter. Witness 2 believed SARIKEY convinced Witness 1 not to cooperate with the authorities.
- D. Witness 2 recalled Witness 1's first name, and Witness 2 provided that to law enforcement. The first name provided by Witness 2 is Witness 1's true first name.

9. **Interview with Minor Victim 1:** Minor Victim 1 was interviewed on January 18, 2023. Minor Victim 1 is now an adult. During the interview, Minor Victim 1 disclosed the following:

A. Minor Victim 1 recalled SARIKEY as Witness 1's former boyfriend.

B. Minor Victim 1 relayed three distinct memories involving herself, Witness 1, and SARIKEY, as it related to sexually explicit conduct.

Minor Victim 1 remembered conduct that occurred when she was between the ages of 5-8 years old. The conduct occurred at SARIKEY's Indianapolis, Indiana apartment.

i. One incident involved Minor Victim 1 laying naked, in the dark, on SARIKEY's bed in his apartment. SARIKEY placed candy gummy worms by her vagina. SARIKEY ate the gummy worms and fed Minor Victim 1 the gummy worms. Minor Victim 1 thought SARIKEY urinated on her vagina, but she now believes SARIKEY ejaculated seminal fluid on her vagina. SARIKEY was on top of Minor Victim 1 during this incident.

ii. The second incident recounted by Minor Victim 1 involved digital penetration of the anuses of Minor Victim 1 and Witness 1 by SARIKEY. Minor Victim 1 recalled during this incident, Witness 1 leaned over and whispered to Minor Victim 1 that everything was going to be okay.

iii. During the third incident. SARIKEY put his penis in the mouth of both Minor Victim 1 and Witness 1. Minor Victim 1 recalled

Witness 1 had a strawberry lubricant, and Witness 1 applied it to SARIKEY's penis.

iv. Minor Victim 1 stated she spent the night at SARIKEY's apartment with Witness 1 and SARIKEY when these events happened. The following morning, Witness 1 made Minor Victim 1 promise to keep what happened a secret.

C. Minor Victim 1 recalled an "agency" coming out to her house when she was in sixth grade and asked her if anything inappropriate happened between Witness 1, SARIKEY, and herself. Minor Victim 1 stated she denied anything ever happened, because it was a secret between her and Witness 1.

10. **Interview with Witness 1:** Witness 1 was interviewed January 23, 2023, at her residence. During the interview Witness 1 disclosed the following:

A. When Witness 1 was 17 years old, she met and started dating SARIKEY. SARIKEY was 19 years old. They met online on Myspace. SARIKEY attended ITT Technical Institute in Indianapolis, Indiana. SARIKEY lived in a second-floor studio apartment in a complex located at the corner of Ditch and 79th street in Indianapolis, Indiana. Witness 1 stated she spent most of her time at SARIKEY's apartment instead of at her family's residence located elsewhere in the Southern District of Indiana.

B. Approximately 6 months into their relationship, SARIKEY told Witness 1 that he was a pedophile. SARIKEY told Witness 1 he only looked

at child pornography, but he really wanted to be hands-on with a child.

C. In approximately 2009, Witness 1 began bringing Minor Victim 1 over to SARIKEY's apartment. Witness 1 turned 19 years old in April of 2009.

D. Witness 1 recalled at least three separate incidents in which SARIKEY engaged in sexually explicit activities with Minor Victim 1, while at the apartment.

i. One incident involved SARIKEY utilizing candy gummy worms to entice Minor Victim 1 to "suck" his penis.

ii. Another time, SARIKEY gave Minor Victim 1 some type of drug he had purchased online, which made Minor Victim 1 unconscious. SARIKEY then tried to digitally penetrate Minor Victim 1's vagina, got freaked out, and ended up just masturbating.

iii. The third incident involved SARIKEY fondling Minor Victim 1's vagina over her pants.

E. Witness 1 reported that SARIKEY took pictures of Minor Victim 1 with a digital camera when she was drugged. Witness 1 was present when SARIKEY took the pictures. SARIKEY saved the images in a file on his computer.

F. Witness 1 admitted to participating in the sexual acts performed

on Minor Victim 1 but Witness 1 said she did so at SARIKEY's request. Witness 1 said that she touched, caressed, and kissed Minor Victim 1 on various body parts. Witness 1 admitted to kissing Minor Victim 1's "clit" once.

G. In 2015, Witness 1 disclosed what happened between SARIKEY and Minor Victim 1 to her therapist. Due to Minor Victim 1's age, the therapist reported the incident to the Department of Child Services (DCS).

H. Witness 1 knew SARIKEY saved the computer file containing the images of Minor Victim 1, because SARIKEY threatened to expose Witness 1 and to send the file to other people when Witness 1 broke up with SARIKEY in 2011. He made threats again in 2015, after DCS contacted him.

I. In or around May of 2010, SARIKEY moved from Indianapolis, Indiana to Buffalo, New York.

11. **Identification of Vincent SARIKEY:** During this investigation, I located the following information concerning SARIKEY:

A. SARIKEY's publicly available LinkedIn page indicated SARIKEY attended ITT Technical Institute from 2006-2010.

B. SARIKEY's Myspace account has Witness 1 listed as a contact.

C. SARIKEY's Lexis Nexis report indicated he resided at 1734 Tanglewood Square, Apartment 454, Indianapolis, Indiana 46260 in Marion County, beginning in 2007. This address is close to 79th and Ditch Rd.

12. **Examination of a “3 Hitachi Hard Drive”:** On October 14, 2022, WFO FBI executed a federal search warrant on SARIKEY's residence located in Herndon, Virginia. During the search multiple electronic devices were seized. One device was a 3 Hitachi Hard Drive. This device (“hereinafter “the hard drive”) contained encrypted data. The FBI unencrypted, imaged, and processed the hard drive for forensic review. The following items were located on the device:

A. Eight images taken on February 2, 2009, with a Cannon PowerShot S200 digital camera. These images depict a pre-pubescent minor female engaged in sexually explicit conduct. The file was located in file path "UltimateShowDown/all2/hidden/HSgirls/girls/(NICKNAME OF MINOR VICTIM 1)" (actual file path name known to Your Affiant but redacted). Minor Victim 1 has been identified as the pre-pubescent female in the images. Minor Victim 1 was less than eight years old when the images were captured.

i. IMG_1889.JPG depicts Minor Victim 1, who appears to be unconscious, on a bed. A white male is sitting next to Minor Victim 1 on the bed. The male has pants on, but his penis is exposed. The male, identified as SARIKEY, is holding his exposed penis in his hand.

ii. IMG_1890.JPG depicts Minor Victim 1 who appears to be unconscious, on a bed. The same white male from IMG_1889 has his exposed penis laying on Minor Victim 1's forehead.

- iii. IMG_1891.JPG depicts the vagina of Minor Victim 1.
- iv. IMG_1892.JPG depicts the vagina of Minor Victim 1.
- v. IMG_1893.JPG depicts a close-up image of Minor Victim 1's vagina.
- vi. IMG_1894.JPG depicts a close-up image of Minor Victim 1's vagina.
- vii. IMG_1895.JPG depicts a close-up of an adult hand (believed to be a male hand) utilizing his fingers to spread the labia of Minor Victim 1.
- viii. IMG_1896.JPG depicts an image of an adult female (believed to be Witness 1) performing oral-genital sexual intercourse on Minor Victim 1.

B. A Cannon PowerShot S200 digital camera was also located and photographed during the federal search warrant executed at SARIKEY's residence in Herndon, Virginia.

C. In addition to the images described above, 7 videos, depicting Witness 1 and Minor Victim 1 engaged in sexually explicit conduct, were located on the hard drive in file path "UltimateShowDown/all2/hidden/HSgirls/EXGF/4(Witness 1's name)/Tstuff/ourprog)".

13. **Examination of a “Samsung S9”:** On October 14, 2022, during the execution of a federal search warrant on SARIKEY's residence located in Herndon, Virginia, a Samsung S9 (“hereinafter “the phone”) was seized. The FBI imaged and processed the phone for forensic review. During a review of the forensic report, investigators found a chat in the Signal application. The chat occurred between SARIKEY and Witness 3 (Witness 3's identity is known to Your Affiant but redacted for the purposes of this Affidavit). Your Affiant believes Witness 3 is a close friend of SARIKEY, based on their chat history, and Witness 3's knowledge of Minor Victim 1 and Witness 1. SARIKEY and Witness 3 often chat about computer programming and their respective jobs, however SARIKEY also messaged Witness 3 several times expressing SARIKEY's sexual interest in minors. SARIKEY discussed with Witness 3 SARIKEY's involvement with Minor Victim 1 and Witness 1. The following are excerpts from the Signal chat between SARIKEY and Witness 3:

A. November 18, 2015:

- i. SARIKEY tells Witness 3 he is going to send Witness 3 an encrypted file with “All bad stuff”. SARIKEY stated he is sending Witness 3 the file, “So in case I go down you will be able to help me take her down easily.”
- ii. SARIKEY said Witness 1 told him something came up with Minor Victim 1, but she took care of it.
- iii. SARIKEY indicated there is a video on a laptop. SARIKEY told Witness 3 “And only evidence is encrypted on my laptop

of Witness 1 doing shit.”

iv. SARIKEY told Witness 3, “Witness 1 knows the pix and vids and she goes down. That was our only agreement and if she violated it I mean....She’s (Witness 1) super fucked.”

B. November 19, 2015:

i. SARIKEY stated he doubts Minor Victim 1 remembers any details. He did some snooping on Minor Victim 1. “She’s like a bit retarded or something and makes a lot of shit up lol.” “She’s 13 now and writes like she’s 5 lmao.”

C. July 30, 2017:

ii. SARIKEY and Witness 3 are talking about young girls. SARIKEY states, “Rly fucks with my head want to eliminate it but can’t get rid of it it’s the worst”... “Indulging not correct path and not allowing it leads to illogical decisions”... “Just can’t win.”

iii. SARIKEY states, “One time with (Witness 1)’s sister I wanted to know what it felt like” “Pushed pinky in”...”And it actually pinched so hard it hurt.”

iv. SARIKEY tells Witness 3, “My main concern now is having my own kids.” “If it becomes sexual it’s going to be such a chaotic brain battle I don’t know if I will kill myself or not.” “Just worried it will happen heh.” SARIKEY states, “Also if one kid like me...And actually wants shit”...”Ya like I think I can hold back if I

have bad thoughts”...” But if kid is somehow kinky/into it”...”It will be impossible my brain will just fail itself.”

v. SARIKEY stated that Witness 1 asked him “if I had sent pix out like others have them.” SARIKEY stated he told her “no”.

vi. SARIKEY told Witness 3 “Yah all pix/vid evidence is only of (Witness 1) doing shit”...”None of me”...”Yah fuck that no evidence for me”...”Only words”...”Also this is so dumb to say but”... “I was super nice and only did what sister wanted or let me try.”

vii. SARIKEY stated, “(Witness 1) just like forced her/yelled at her and didn’t get it since not actually a pedo lol”...”I had it set up to show she orchestrated it.”

14. **Interstate and Foreign Commerce:** SARIKEY used digital devices to transport the images of Minor Victim 1 in interstate and foreign commerce. The visual depictions of Minor Victim 1 were produced and stored using a device that was not manufactured or contain parts that were not manufactured in the State of Indiana, and, therefore, travelled in interstate and foreign commerce.

15. **Venue:** The sexual exploitation of a of Minor Victim 1 occurred in the Southern District of Indiana. The possession and transportation of child pornography occurred in both the Southern District of Indiana and the Eastern District of Virginia.

16. **Conclusions Drawn:** This Affiant believes, based on the evidence set forth above, that Vincent SARIKEY used Minor Victim 1 to create visual depictions

of sexually explicit conduct and attempted to use a minor to create visual depictions of sexually explicit conduct, using materials that travelled in interstate or foreign commerce, and aided and abetted others in so doing, in violation of 18 U.S.C. § 2251(a) and (e).

CONCLUSION

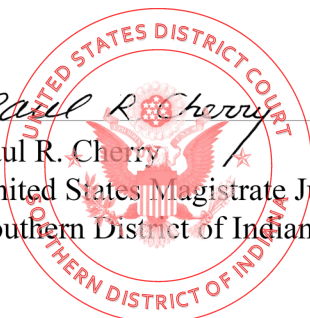
17. **Conclusion:** Based upon the contents of this Affidavit, there is probable cause to believe that Vincent SARIKEY has committed the above listed offense. I respectfully request that the Court issue a Criminal Complaint and Arrest Warrant for Vincent SARIKEY, charging him with the offense listed above.

s/Elizabeth M. Carlson

Special Agent Elizabeth M. Carlson
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of
Fed.R.Crim.P. 4.1 by telephone.

Date: April 19, 2023


Paul R. Cherry
Paul R. Cherry
United States Magistrate Judge
Southern District of Indiana