

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Cristine Perez, being a duly sworn Special Agent with Federal Bureau of Investigation (FBI), hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am empowered by law to conduct investigations and to make arrests in connection with federal felony and misdemeanor offenses. I am a Special Agent of the FBI and have been employed as such since May 12, 2019. I am currently assigned to the Counterterrorism program in the San Juan, Puerto Rico Field Office of the FBI, where I investigate financial crimes related to violations of Title 18 of the United States Code and other violations of federal law. I have twelve years of experience with the FBI, of which nine were spent as an intelligence analyst and three as a special agent. As an intelligence analyst, I gained basic skills in conducting investigations and searches within constitutional parameters, drafting affidavits, investigating domestic and international criminal enterprises, investigating cyber threats/vulnerabilities, confidential human source (CHS) handling, evidence handing/collection, working with classified intelligence/methods, conducting intelligence analysis, and using advanced investigative techniques (pen registers, undercover operations, Title III wire intercepts, among others.).

2. I have prepared this affidavit for the purpose of establishing probable cause to believe that Robinson De La Cruz Hilario (ROBINSON) has committed violations of 18 U.S.C. § 875(c) (Interstate communication of threats); 18 U.S.C. § 2252A(a)(2) (Receiving child pornography, or attempting to do so); 18 U.S.C. § 1466A (Receipt and Possession of Obscene visual representations of the sexual abuse of children). The facts stated herein are based on my

personal participation in this investigation, my training and experience, and my conversations with other law enforcement officers and persons with knowledge.

FACTS ESTABLISHING PROBABLE CAUSE

3. On February 24, 2026, FBI San Juan Field Office Counterterrorism Program received a referral from the United States Marshals Service (USMS) based on tip that came in through their tipline by an anonymous tipster. The tip said that a social media user was planning a mass shooting event against the lesbian, bisexual, gay, transexual, queer (LGBTQ) community and had sent to the tipster a “tactical” map related to the plan. Agents reviewed the map, and determined it showed a gay-friendly bar in the metropolitan area in Puerto Rico. Agents identified the social media account and identified subject Robinson De La Cruz Hilario (ROBINSON) as the user.

4. ROBINSON’S public social media posts included numerous posts in which he professes his hatred of LBGT people. Agents reviewed his public posts and found statements and images going back to at least 2024 in which ROBINSON stated his intent to carry out a mass shooting, which I will describe in the following paragraphs.

5. On February 19, 2026, ROBINSON re-posted on his Facebook social media account with display name Robinson Hilario a photo depicting the Pulse nightclub mass shooting on June 12, 2016. ROBINSON commented “Omar eres y será siempre un héroe” translated to English as Omar Mateen¹ is and will always be a hero.

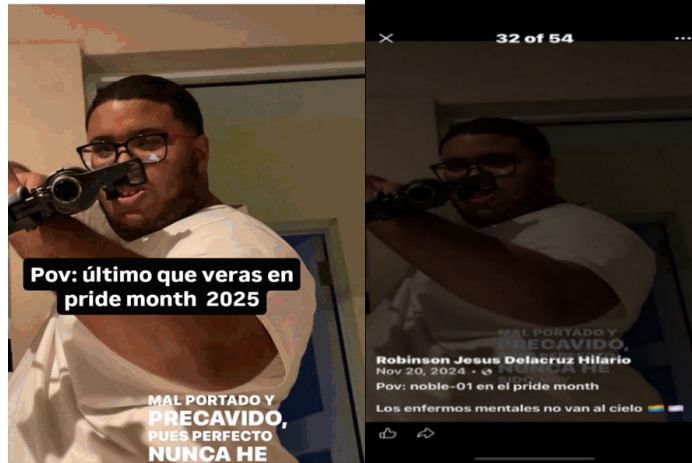
¹ Omar Mir Seddique Mateen was an American mass murderer who killed 49 people and wounded 58 others, 53 of them by gunfire in a mass shooting at the Pulse nightclub, a gay nightclub, in Orlando, Florida, on June 12, 2016, before he was killed in a shootout with the local police.

6. On October 15, 2024, ROBINSON posted on his Facebook social media account with display name Robinson Jesus Delacruz Hilario a photo of a hand holding a firearm with comment “Look mom I’m a professional shooter”, as the image below illustrates.



7. On November 8, 2024, ROBINSON posted on his Facebook social media account with display name Robinson Jesus Delacruz Hilario two screenshots, one of the screenshots was Wikipedia biography of Omar Mateen and the other screenshot included photos of Omar Mateen.

8. On November 20, 2024, ROBINSON posted on his Facebook social media account with display name Robinson Jesus Delacruz Hilario a photo of himself holding what appears to be a firearm with the phrase “POV last thing you will see on Pride month” in Spanish. ROBINSON commented “POV: noble-01 in the pride month. Mental sickos do not go to heaven” in Spanish followed by the LGBTQ flag and transgender flag, as the images below illustrate. Agents are unable to determine if the guns in the photos in his posts are real firearms.



9. On November 30, 2024, ROBINSON re-posted an image of a cartoon woman surrounded by hearts depicting colors associated with the LGBTQ community with the phrase “How it excites me to destroy traditional family values” in Spanish. ROBINSON commented that “he would finish what Omar Mateen could not” in Spanish.

10. On May 4, 2026, a United States Magistrate issued a search and seizure warrant for Google accounts attributed to ROBINSON to search for evidence of violations of 18 U.S.C. §§ 249, 371, and 924(c). On May 5, 2026, agents received the Google search warrant results. The contents of the Google accounts include voluminous electronic media which consists of images, browser history, payment history, activity logs, artificial intelligence generated media, and email content, among other things.

11. While reviewing the still images and videos included in the search warrant results, agents found still images and videos of what appear to be minors engaged in sexually explicit conduct. Agents also came across as many as 500 images that contain cartoon and artificial intelligence-created obscene visual representations of minors engaging in sexually explicit conduct. A search warrant was obtained to continue searching the Google return for child pornography.

12. A further review of the Google return revealed still images and approximately 7 videos of child pornography. The videos were found in relation to account Robinson de la Cruz 350. The pathway of the child pornography in the Google return showed that the images were received from the Signal messaging application. A description of the some of the child pornography videos found is included below:

a. (3hya) Video of 243.07 seconds duration created date on 11/30/25 downloaded from the Signal platform on 12/02/25 depicting a prepubescent minor female (appearing to be 8 to 12 years of age based on body shape and size and lack of pubic hair) being penetrated vaginally by an adult erect penis.

b. (kzci) Video of 539.0 seconds duration created date on 11/30/25 downloaded from the Signal platform on 12/02/25 depicting a minor female (appearing to be 11 to 14 years of age based on face, barely developed breast, and genitalia composition lacking pubic hair) being penetrated vaginally by an adult erect penis while wearing a sleep mask. The initial frame of video contained a title labeling or advertising the video that said “12 year old Latina fucked in hotel” with the face of an apparent minor. (This video appears to have been downloaded twice).

c. (gd42) Video of 137.21 seconds duration downloaded from the Signal platform on 12/02/25 depicting a prepubescent minor female (appearing to be approximately 8 to 12 years of age based on body size and shape genitalia composition and lack of pubic hair) using her hand to manually stimulate an erect adult penis and being penetrated vaginally by an adult erect penis.

d. (jraq) Video of 62.83 seconds duration downloaded from the Signal platform on 03/02/24 depicting a prepubescent minor female (appearing to be approximately 8 to 10

years of age based on underdeveloped breast under her shirt and body composition) providing oral sex to and being penetrated by an adult erect penis. The minor was naked from the waist down.

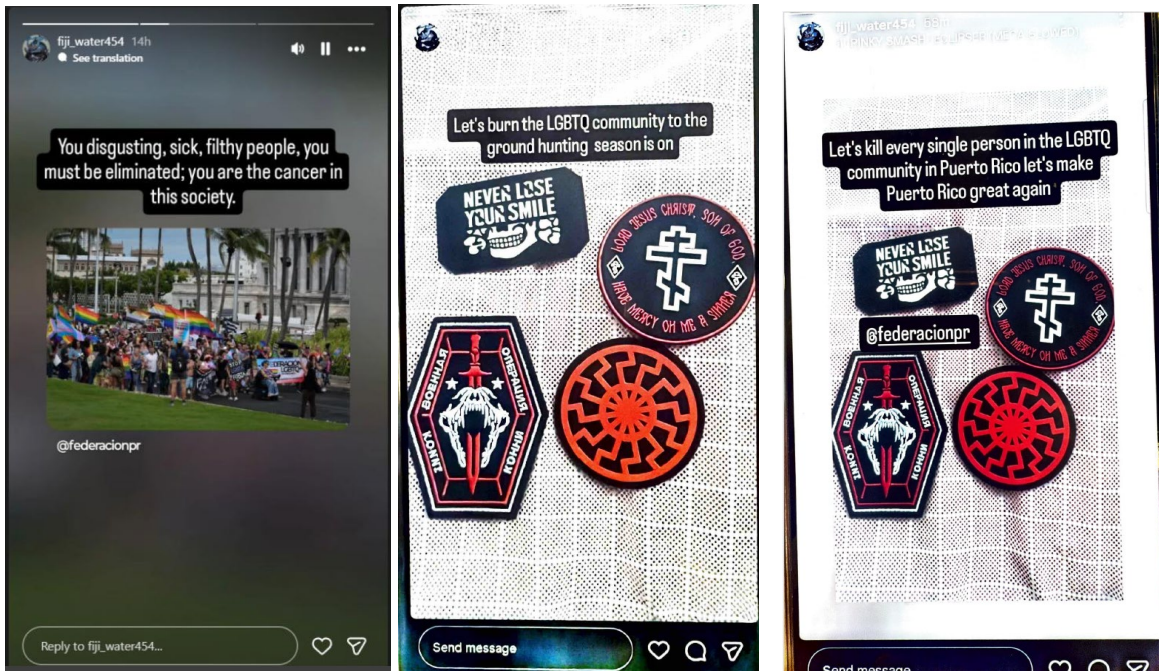
13. Analysis of the metadata of one of one of the photos with file name from signal-2025-xxxx.jpg, showed that the image was uploaded to Google Photos from a Motorola Moto G 5G (2023) located in Puerto Rico—consistent with the device attributed to ROBINSON by way of a Claro subpoena return for subscriber data, and that also appeared to ping at the residence attributed to ROBINSON based on the results of a location search warrant to Claro for his cellular device. To be clear, the IMEI for the Motorola phone in the Claro return is the same device that shows up in the Google return.² Notably, the image metadata contained the org.thoughtcrime.securesms package name in the appSource field, combined with the distinctive signal-... filename pattern, both of which match Signal's official documentation and application identity.

14. The data from the account also included posts promoting pedophilia depicting cartoons of nude or partly nude female minors in sexually compromising positions by themselves, with other minors, and/or adults. Some of the identified posts had comments like “Anya Knows what you want...PEDO”, “Litle girls have the best ass”, “children are better jerk off pedo”, “Pedo cover her face cum on her mouth cum you want to cum so bad, don’t you? Let it all out, pedo”. As it is used in these images, “pedo” means pedophile.

15. ROBINSON continued to make public posts on his Instagram account consistent with his stated desire to carry out a mass shooting that also constitute violations of 18 U.S.C. §

² All the Google accounts that were the subject of the Google search warrant show the same device with IMEI number as the associated device.

875(c) (interstate communication of threats), such as the following messages. On June 4, 2026, he posted a picture of people celebrating Pride month in front of the Puerto Rican legislature, tagged an LGBT rights group, and wrote above the picture “You disgusting, sick filthy people, you must be eliminated; you are the cancer in this society.” Then on June 8, 2026, he posted patches, some of which are associate with neo-Nazis but at least one of which comes from a video game, and he wrote above them “Let’s burn the LGBTQ community to the ground hunting season is on” and “Let’s kill every single person in the LGBTQ community in Puerto Rico let’s make Puerto Rico great again.” These posts were transmitted using a service that routes the communications/posts through interstate facilities and networks. Below are images of those posts:



16. On June 22, 2026, a Magistrate Judge authorized a search warrant for the residence and person ROBINSON, to include authorizing the search and seizure of devices. The search warrant was executed by the FBI on June 24, 2026.

17. ROBINSON waived his rights by signing the FBI advice of right form and subsequently agreed to be interviewed. ROBINSON admitted he had a social media presence on Instagram, Facebook, Signal, and Discord and acknowledged some of his media posts have gone over the line and could be interpreted as threats. He admitted to posting images of firearms on Instagram which led to his account being blocked or taken down. He took ownership of sharing the most recent post of a selfie with a Glock handgun belonging to a friend. He has also shared a post with a rifle. Robinson researched weapons and taught himself to handle them using the internet. Robinson claims he was trolling when making the posts that were threatening. He has made posts that were targeted towards LGBTQ community and the Jewish community. He acknowledged that his trolling could be seen as making threats. He described what threats were and acknowledged some of his posts were threats. He confirmed his email accounts and their purposes. ROBINSON also admitted to making the map using AI and called it a strategic map of attack. On the map, he said the green marking was an “extraction point”, the yellow were routes, and the red was the target (the bar). He suggested this was a hypothetical attack plan and that he no intention of carrying it out. He believed that with the fear from threats and trolling he could get the events of pride month cancelled. He acknowledged his accounts were public and not private. He has been to the bar approximately 6 times. He also discussed meeting a person online about getting a weapon.

18. As to the sexually explicit images and cartoons of minors, ROBINSON claimed images were automatically downloaded from discord groups he followed. He subsequently acknowledged images were also automatically downloaded via the Signal platform. As to the cartoon images of minors engaging in sexually explicit conduct, ROBINSON admitted

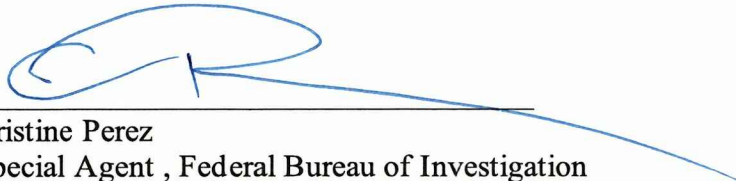
downloading the images. Robinson admitted to being able to tell the difference between child and adult anatomical features.

19. The Motorola Moto G 5G (2023) was found and seized from ROBINSON during the execution of the search warrant. ROBINSON admitted that was his cellular device and only he had control of the device. A preliminary review of the cellular device, revealed in the Gallery cartoon images of minors engaged in sexually explicit conduct.

CONCLUSION

20. Based on the aforementioned facts, I believe that there is probable cause to believe that Robinson De La Cruz Hilario knowingly committed or attempted to commit the following offenses: has committed violations of 18 U.S.C. § 875(c) (Interstate communication of threats); 18 U.S.C. § 2252A(a)(2) (Receiving child pornography, or attempting to do so); 18 U.S.C. § 1466A (Receipt and Possession of Obscene visual representations of the sexual abuse of children)

I hereby declare, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge.



Cristine Perez
Special Agent , Federal Bureau of Investigation

Sworn by telephone pursuant to Fed. R. Crim. P. 4.1 on this ___ day of June, 2026 at _____.

Giselle López-Soler
United States Magistrate Judge