AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Puerto Rico

United States of America)
v.)
)
Félix Verdejo Sánchez) Case No. 21-mj-586
)
)
)
)

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 April 29, 2021 in the county of --- in the --- District of Puerto Rico, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1201	Kidnapping resulting in death
18 U.S.C. § 2119(3)	Carjacking resulting in death
18 U.S.C. § 1841	Killing of unborn child

This criminal complaint is based on these facts:

See attached affidavit.
The United States requests that defendant be detained.
Approved by AUSA Jonathan Gottfried

☑ Continued on the attached sheet.

Complainant's signature

FBI Special Agent Lorenzo Vilanova Perez
Printed name and title

Executed in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 6:02 pm on May 2, 2021.

Date: May 2, 2021

Digitally signed by Hon. Giselle López-Soler

Judge's signature

City and state: San Juan, Puerto Rico

U.S. Magistrate Giselle Lopez-Soler
Printed name and title

AFFIDAVIT

I, Lorenzo E. Vilanova Perez, hereinafter referred to as your affiant, a Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, state and depose as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since 2019. I am currently assigned to the FBI's San Juan Division, Violent Crimes / Major Offenders Squad. As an FBI Special Agent I have received extensive training in a variety of investigative and legal matters pertaining to violations of federal and state law. I am "an investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code. I am, therefore, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code. During my employment with the FBI, I have participated in various violent crime investigations along with other FBI Special Agents (SAs) and Task Force Officers (TFOs).

2. The details and information stated herein are based on my training, experience and discussions with other law enforcement agents. I have drafted this affidavit for the limited purpose of establishing probable cause to believe that FELIX VERDEJO SANCHEZ committed the offenses described in the attached criminal complaint. Accordingly, I have not included each and every fact of this investigation that is known to me.

FACTS SUPPORTING PROBABLE CAUSE

3. On April 29, 2021, a woman (hereinafter referred to as "the Victim") was reported missing to Puerto Rico Police Bureau ("PRPB") officers. On May 1, 2021, the lifeless body of the Victim was recovered by police in the San Jose Lagoon.

4. The FBI interviewed a person (hereinafter referred to as "the Witness") with first-hand, personal knowledge of the events surrounding the death of the Victim and who had

provided corroborated information regarding the disappearance of the Victim. The Witness provided the FBI with information that included the following:

A. On or about April 27, 2021, FELIX VERDEJO SANCHEZ (hereinafter referred to as "Verdejo") contacted the Witness and requested his help to terminate the pregnancy of the Victim, who told Verdejo that she was pregnant with his child based on a pregnancy test.

B. On April 29, 2021, Verdejo contacted the Victim and arranged to meet near her residence. Verdejo and the Witness drove to the meeting in Verdejo's black Dodge Durango SUV.

C. The Victim arrived at the meeting place in her vehicle, a gray Kia Forte. She entered Verdejo's vehicle.

D. Following a conversation between Verdejo and the Victim in Verdejo's car, Verdejo punched the victim in the face, and she was injected with a syringe filled with substances purchased from a drug point in Llorens Torres. Verdejo and the Witness then restrained the Victim's arms and feet with wire. A block was tied to the Victim. The Witness took the Victim's keys and boarded the Victim's nearby Kia.

E. Verdejo and the Witness drove the two vehicles towards the Teodoro Moscoso Bridge, which spans the San Jose Lagoon between San Juan and Carolina, Puerto Rico.

F. Verdejo and the Witness then drove onto the bridge, where the Victim was removed from the vehicle and tossed off the side of the bridge and into the water. Verdejo shot at the Victim with a pistol from the bridge. The Victim's car was later abandoned.

5. On April 30, 2021, PRPB officers found the Victim's vehicle in Canovanas.

6. PRPB interviews of the Victim's family members revealed that the Victim used cellular telephone number 787-xxx-2408. On April 30, 2021 the FBI obtained call detail records and location data for the aforementioned number.

7. On April 30, 2021, the FBI also obtained call detail records and location data for telephone number 787-xxx-3693. The listed subscriber for this number is FELIX G. VERDEJO SANCHEZ.

8. The analysis of this data showed that on the morning of April 29, 2021, the phones associated with the Victim and Verdejo became connected to several cellular communication towers, located within close proximity of one another, at several sites throughout the San Juan and Carolina area. These communication towers include towers located near the Teodoro Moscoso Bridge.

9. Toll records obtained by the FBI of Verdejo's phone show communications with the Witness's phone on the dates of April 28 and 29, 2021. The records show at least one phone call and several text messages between them on April 28, 2021 throughout the morning. The records also show at least two phone calls and several text messages between them on April 29, 2021 throughout the morning.

10. The FBI reviewed April 29, 2021 surveillance camera footage of the Teodoro Moscoso Bridge. At approximately 8:29 AM, the video depicts a dark SUV type vehicle consistent with the appearance of Verdejo's vehicle parking on the emergency lane of the bridge. There is visible movement of at least one individual on the side of the vehicle. The video then depicts the SUV departing the location and returning to a nearby spot on the bridge on at least two additional occasions. The SUV departs the area at approximately 9:31 AM.

11. Police found at least one shell casing near the spot on the bridge depicted by the video.

12. Police interviews revealed that the Victim had recently informed the family that she was pregnant.

13. Prior to April 29, 2021 and in order to have been located in Puerto Rico, the Victim's Kia Forte had been transported, shipped or received in interstate or foreign commerce.

14. In committing and in furtherance of the criminal conduct described herein, Verdejo communicated with the Victim and Witness via a cellular phone and drove a car, which are instrumentalities of interstate or foreign commerce. Both the Dodge Durango and the Kia Forte were used in committing or in furtherance of the commission of the kidnapping offense described herein.

CONCLUSION

Based on the above facts, the undersigned affiant believes there is probable cause to charge FELIX VERDEJO SANCHEZ with violating the following Federal law, to wit: Title 18 United States Code, Sections 2119(3) (carjacking resulting in death), 1201 (kidnapping resulting in death), 1841 (intentionally killing unborn child).

Lorenzo Vilanova Perez
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me pursuant to FRCP 4.1 at 6:02 pm, by telephone, this 2nd day of May 2021, in San Juan, Puerto Rico.

Digitally signed by Hon. Giselle López-Soler

Honorable Giselle Lopez-Soler
United States Magistrate Judge