

VIRGINIA:

BEFORE THE VIRGINIA STATE BAR DISCIPLINARY BOARD

**IN THE MATTER OF
MATTHEW JAMES ERAUSQUIN**

**VSB DOCKET NO(S). 22-000-124031
21-042-121272**

CONSENT TO REVOCATION ORDER

On October 22, 2021, came Matthew James Erausquin and presented to the Board an Affidavit Declaring Consent to Revocation (hereinafter "Affidavit") of his license to practice law in the courts of this Commonwealth. By tendering his Consent to Revocation at a time when a disciplinary Complaint, Investigation or Proceeding is pending, the nature of which is specifically set forth in the attached Affidavit, Respondent acknowledges that the material facts contained in the pending disciplinary Complaint, Investigation or Proceeding are true.

The Board having considered the Affidavit, and Bar Counsel having no objection, the Board accepts his Consent to Revocation.

Upon consideration whereof, it is therefore ordered that Matthew James Erausquin 's license to practice law in the courts of this Commonwealth be and the same hereby is revoked, and that the name of Matthew James Erausquin be stricken from the Roll of Attorneys of this Commonwealth.

It is further ORDERED that The Respondent must comply with the requirements of Part 6, Section IV, Paragraph 13-29 of the Rules of the Supreme Court of Virginia. The Respondent shall forthwith give notice by certified mail of the Revocation of his license to practice law in the Commonwealth of Virginia, to all clients for whom he is currently handling matters and to all opposing Attorneys and presiding Judges in pending litigation. The Respondent shall also make appropriate arrangements for the disposition of matters then in his care in conformity with the wishes of his clients. The Respondent shall give such notice immediately and in no event later than 14 days of the effective date of the Revocation, and make such arrangements as are required herein as soon as is practicable and in no event later than 45 days of the effective date of the Revocation. The Respondent shall also furnish proof to the Clerk of the Disciplinary System of

the Virginia State Bar within 60 days of the effective date of the Revocation that such notices have been timely given and such arrangements have been made for the disposition of matters.

It is further ORDERED that if the Respondent is not handling any client matters on the effective date of the Revocation, he shall submit an affidavit to that effect within 60 days of the effective date of the Revocation to the Clerk of the Disciplinary System at the Virginia State Bar. The Board shall decide all issues concerning the adequacy of the notice and arrangements required herein. The burden of proof shall be on the Respondent to show compliance. If the Respondent fails to show compliance, the Board may impose a sanction of Revocation or additional Suspension for failure to comply with the requirements of subparagraph 13-29.

It is further ORDERED that the Clerk of the Disciplinary System shall mail an attested copy of this order by electronic, regular and certified mail, return receipt requested, to the Respondent, Matthew James Erasquin at his address of record with the Virginia State Bar, being, Consumer Litigation Associates, P.C., 1800 Diagonal Rd, Suite 600, Alexandria, VA 22134 and a copy sent by electronic mail to Edward B. MacMahon Jr., Counsel for Respondent, and to Renu Brennan, Bar Counsel.

Entered this 25th day of October, 2021

Virginia State Bar Disciplinary Board

By _____

Carolyn V. Grady

Carolyn V. Grady
Chair

Digitally signed by Carolyn V.
Grady
Date: 2021.10.25 15:10:36 -04'00'



VIRGINIA:

BEFORE THE VIRGINIA STATE BAR DISCIPLINARY BOARD

IN THE MATTER OF

MATTHEW JAMES ERAUSQUIN

VSB DOCKET NOS. 22-000-124031

21-042-121272

AFFIDAVIT DECLARING CONSENT TO REVOCATION

Matthew James Frausquin, after being duly sworn, states as follows:

1. I was licensed to practice law in the Commonwealth of Virginia on December 15, 2003.
2. I submit this Affidavit Declaring Consent to Revocation pursuant to Rule of Court, Part 6, Section IV, Paragraph 13-28.
3. My consent to revocation is freely and voluntarily rendered. I am not being subjected to coercion or duress. I am fully aware of the implications of consenting to the revocation of my license to practice law in the Commonwealth of Virginia.
4. On October 18, 2021, I pled guilty in the United States District Court for the Eastern District of Virginia, Alexandria Division, to six counts of Sex Trafficking a Minor in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c). Copies of the Plea Agreement and Statement of Facts are attached as Exhibits A and B.
5. I acknowledge and adopt the facts as stated in the Plea Agreement and Statement of Facts attached as Exhibits A and B.
6. I acknowledge that the maximum sentence provided by statute for the offenses to which I pled guilty are a mandatory minimum term of imprisonment of ten years, a maximum term of life imprisonment, a fine of \$250,000, full restitution, a minimum of five years to life of supervised release, and additional assessments and forfeiture of assets.

7. As a result of my actions and guilty plea to six counts of Sex Trafficking a Minor, as set forth in Exhibits A and B, I consent to revocation of my license to practice law in the Commonwealth of Virginia.

8. I, Matthew James Erasquin, submit this Affidavit and consent to the revocation of my license to practice law in the Commonwealth of Virginia because I know that I cannot successfully defend any Misconduct proceedings or proceedings under Para. 13-22 relating to my actions as set forth in the Plea Agreement and Statement of Facts, Exhibits A and B.

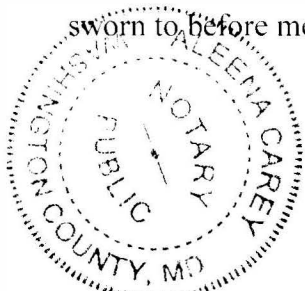
Executed and dated on 10/21/21

Matthew J Erasquin
Matthew James Erasquin
Respondent

COMMONWEALTH OF VIRGINIA
CITY/COUNTY OF Hagerstown/Washington to wit:

The foregoing Affidavit Declaring Consent to Revocation was subscribed and

sworn to before me by Matthew James Erasquin on 10/21/2021



Aleena Carey
Notary Public

My Commission expires: 08/03/2025



IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	No. 1:21-CR-49 CMH
)	
v.)	
)	
MATTHEW J. ERAUSQUIN,)	
a/k/a MATT HAMMOND)	
)	
Defendant.)	



PLEA AGREEMENT

Jess Aber, United States Attorney for the Eastern District of Virginia; undersigned counsel for the United States; the defendant, Matthew Erausquin; and the defendant's counsel have entered into an agreement pursuant to Rule 11 of the Federal Rules of Criminal Procedure. The terms of the agreement are as follows:

1. Offense and Maximum Penalties

The defendant agrees to plead guilty to Counts One through Six of the indictment. Counts One through Six charges the defendant with Sex Trafficking a Minor in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c). The maximum penalties for the offenses are: a mandatory minimum term of imprisonment of ten years, a maximum term of life imprisonment, a fine of \$250,000, full restitution, forfeiture of assets as outlined below, special assessment(s) pursuant to 18 U.S.C. § 3013 and a minimum of 5 years to life of supervised release. The defendant understands that this supervised release term is in addition to any prison term the defendant may receive, and that a violation of a term of supervised release could result in the defendant being returned to prison for the full term of supervised release.

2. Detention Pending Sentencing

The defendant understands that this case is governed by 18 U.S.C. §§ 3143(a)(2) and 3145(c). These provisions provide that a judicial officer shall order that a person who has been found guilty of an offense of this kind be detained unless there are statutory justifications why such person's detention would not be appropriate.

3. Factual Basis for the Plea

The defendant will plead guilty because the defendant is in fact guilty of the charged offenses. The defendant admits the facts set forth in the statement of facts filed with this plea agreement and agrees that those facts establish guilt of the offenses charged beyond a reasonable doubt. The statement of facts, which is hereby incorporated into this plea agreement, constitutes a stipulation of facts for purposes of Section 1B1.2(c) of the Sentencing Guidelines.

4. Assistance and Advice of Counsel

The defendant is satisfied that the defendant's attorney has rendered effective assistance. The defendant understands that by entering into this agreement, defendant surrenders certain rights as provided in this agreement. The defendant understands that the rights of criminal defendants include the following:

- a. the right to plead not guilty and to persist in that plea;
- b. the right to a jury trial;
- c. the right to be represented by counsel – and if necessary have the court appoint counsel – at trial and at every other stage of the proceedings; and
- d. the right at trial to confront and cross-examine adverse witnesses, to be protected from compelled self-incrimination, to testify and present evidence, and to compel the attendance of witnesses.

5. Sentencing Guidelines, Recommendations, and Roles

The defendant understands that the Court has jurisdiction and authority to impose any sentence within the statutory maximum described above but that the Court will determine the defendant's actual sentence in accordance with 18 U.S.C. § 3553(a). The defendant understands that the Court has not yet determined a sentence and that any estimate of the advisory sentencing range under the U.S. Sentencing Commission's Sentencing Guidelines Manual the defendant may have received from the defendant's counsel, the United States, or the Probation Office, is a prediction, not a promise, and is not binding on the United States, the Probation Office, or the Court. Additionally, pursuant to the Supreme Court's decision in *United States v. Booker*, 543 U.S. 220 (2005), the Court, after considering the factors set forth in 18 U.S.C. § 3553(a), may impose a sentence above or below the advisory sentencing range, subject only to review by higher courts for reasonableness. The United States makes no promise or representation concerning what sentence the defendant will receive, and the defendant cannot withdraw a guilty plea based upon the actual sentence.

In accordance with Rule 11(c)(1)(B) of the Federal Rules of Criminal Procedure, the United States and the defendant agree to recommend that the Court impose a term of imprisonment of no less than 120 months (10 years) and no greater than 180 months (15 years).

The United States and the defendant agree that the defendant has assisted the government in the investigation and prosecution of the defendant's own misconduct by timely notifying authorities of the defendant's intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources effectively. If the defendant qualifies for a two-level decrease in offense level pursuant to U.S.S.G. § 3E1.1(a) and the offense level prior to the operation of that section is a

level 16 or greater, the government agrees to file, pursuant to U.S.S.G. § 3E1.1(b), a motion prior to, or at the time of, sentencing for an additional one-level decrease in the defendant's offense level.

6. Waiver of Appeal, FOIA and Privacy Act Rights

The defendant also understands that 18 U.S.C. § 3742 affords a defendant the right to appeal the sentence imposed. Nonetheless, the defendant knowingly waives the right to appeal the conviction and any sentence within the statutory maximum described above (or the manner in which that sentence was determined) on the grounds set forth in 18 U.S.C. § 3742 or on any ground whatsoever other than an ineffective assistance of counsel claim that is cognizable on direct appeal, in exchange for the concessions made by the United States in this plea agreement. This agreement does not affect the rights or obligations of the United States as set forth in 18 U.S.C. § 3742(b). The defendant also hereby waives all rights, whether asserted directly or by a representative, to request or receive from any department or agency of the United States any records pertaining to the investigation or prosecution of this case, including without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a.

7. Immunity from Further Prosecution in this District

The United States will not further criminally prosecute the defendant in the Eastern District of Virginia for the specific conduct described in the indictment or statement of facts, except that the United States may prosecute the defendant for any crime of violence or conspiracy to commit, or aiding and abetting, a crime of violence not charged in the indictment as an offense. In such a prosecution the United States may allege and prove conduct described in

the indictment or statement of facts. “Crime of violence” has the meaning set forth in 18 U.S.C. § 16.

8. Dismissal of Other Counts

As a condition of the execution of this agreement and the Court’s acceptance of the defendant’s plea of guilty, the United States will move to dismiss the remaining counts of the indictment against the defendant at the conclusion of this defendant’s sentencing hearing.

9. Defendant’s Cooperation

The defendant agrees to cooperate fully and truthfully with the United States, and provide all information known to the defendant regarding any criminal activity as requested by the government. In that regard:

- a. The defendant agrees to testify truthfully and completely at any grand juries, trials or other proceedings.
- b. The defendant agrees to be reasonably available for debriefing and pre-trial conferences as the United States may require.
- c. The defendant agrees to provide all documents, records, writings, or materials of any kind in the defendant’s possession or under the defendant’s care, custody, or control relating directly or indirectly to all areas of inquiry and investigation.
- d. The defendant agrees that, at the request of the United States, the defendant will voluntarily submit to polygraph examinations, and that the United States will choose the polygraph examiner and specify the procedures for the examinations.

- e. The defendant agrees that the Statement of Facts is limited to information to support the plea. The defendant will provide more detailed facts relating to this case during ensuing debriefings.
- f. The defendant is hereby on notice that the defendant may not violate any federal, state, or local criminal law while cooperating with the government, and that the government will, in its discretion, consider any such violation in evaluating whether to file a motion for a downward departure or reduction of sentence.
- g. Nothing in this agreement places any obligation on the government to seek the defendant's cooperation or assistance.

10. Use of Information Provided by the Defendant Under This Agreement

The United States will not use any truthful information provided pursuant to this agreement in any criminal prosecution against the defendant in the Eastern District of Virginia, except in any prosecution for a crime of violence or conspiracy to commit, or aiding and abetting, a crime of violence (as defined in 18 U.S.C. § 16). Pursuant to U.S.S.G. § 1B1.8, no truthful information that the defendant provides under this agreement will be used in determining the applicable guideline range, except as provided in Section 1B1.8(b). Nothing in this plea agreement, however, restricts the Court's or Probation Officer's access to information and records in the possession of the United States. Furthermore, nothing in this agreement prevents the government in any way from prosecuting the defendant should the defendant knowingly provide false, untruthful, or perjurious information or testimony, or from using information provided by the defendant in furtherance of any forfeiture action, whether criminal or civil,

administrative or judicial. The United States will bring this plea agreement and the full extent of the defendant's cooperation to the attention of other prosecuting offices if requested.

11. Prosecution in Other Jurisdictions

The United States Attorney's Office for the Eastern District of Virginia will not contact any other state or federal prosecuting jurisdiction and voluntarily turn over truthful information that the defendant provides under this agreement to aid a prosecution of the defendant in that jurisdiction. Should any other prosecuting jurisdiction attempt to use truthful information the defendant provides pursuant to this agreement against the defendant, the United States Attorney's Office for the Eastern District of Virginia agrees, upon request, to contact that jurisdiction and ask that jurisdiction to abide by the immunity provisions of this plea agreement. The parties understand that the prosecuting jurisdiction retains the discretion over whether to use such information.

12. Defendant Must Provide Full, Complete and Truthful Cooperation

This agreement is not conditioned upon charges being brought against any other individual. This agreement is not conditioned upon any outcome in any pending investigation. This agreement is not conditioned upon any result in any future prosecution which may occur because of the defendant's cooperation. This agreement is not conditioned upon any result in any future grand jury presentation or trial involving charges resulting from this investigation. This agreement is conditioned upon the defendant providing full, complete and truthful cooperation.

13. Motion for a Downward Departure

The parties agree that the United States reserves the right to seek any departure from the applicable sentencing guidelines, pursuant to Section 5K1.1 of the Sentencing Guidelines and

Policy Statements, or any reduction of sentence pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure, if, in its sole discretion, the United States determines that such a departure or reduction of sentence is appropriate. In addition, the defendant understands that the Court—not the United States—will decide what, if any, reduction in sentence is appropriate.

Furthermore, the proceeding established by the Plea Agreement section titled Breach of the Plea Agreement and Remedies does not apply to the decision of the United States whether to file a motion based on “substantial assistance” as that phrase is used in Rule 35(b) of the Federal Rules of Criminal Procedure and Section 5K1.1 of the Sentencing Guidelines and Policy Statements. As noted above, the defendant agrees that the decision whether to file such a motion rests in the sole discretion of the United States. In addition, should the defendant violate the Plea Agreement, as defined in Breach of the Plea Agreement and Remedies, or should the defendant violate this Cooperation Agreement, the United States will be released from its obligations under either agreement, including any obligation to seek a downward departure or a reduction in sentence. The defendant, however, may not withdraw the guilty plea entered pursuant to the Plea Agreement.

14. Payment of Monetary Penalties

The defendant understands and agrees that, pursuant to 18 U.S.C. § 3613 and 18 U.S.C. § 3572, all monetary penalties imposed by the Court, including restitution, will be due immediately and subject to immediate enforcement by the United States as provided for in Section 3613. Within 14 days of a request, the defendant agrees to provide all of the defendant’s financial information to the United States and the Probation Office and, if requested, to participate in a pre-sentencing debtor’s examination and/or complete a financial statement under penalty of perjury. If the Court imposes a schedule of payments, the defendant understands that

the schedule of payments is merely a minimum schedule of payments and not the only method, nor a limitation on the methods, available to the United States to enforce the judgment. Until all monetary penalties are paid in full, the defendant will be referred to the Treasury Offset Program so that any federal payment or transfer of returned property to the defendant will be offset and applied to pay the defendant's unpaid monetary penalties. If the defendant is incarcerated, the defendant agrees to participate voluntarily in the Bureau of Prisons' Inmate Financial Responsibility Program, regardless of whether the Court specifically directs participation or imposes a schedule of payments. Defendant agrees to make good-faith efforts toward payment of all monetary penalties imposed by the Court.

15. Special Assessment

Before sentencing in this case, the defendant agrees to pay a mandatory special assessment of \$100 per count of conviction.

16. Restitution

Defendant agrees that restitution is mandatory pursuant to 18 U.S.C. § 3663A. Defendant agrees to the entry of a Restitution Order for the full amount of the victims' losses. Pursuant to 18 U.S.C. § 3663A(c)(2), the defendant agrees that an offense listed in § 3663A(c)(1) gave rise to this plea agreement and as such, victims of the conduct described in the charging instrument, statement of facts or any related or similar conduct shall be entitled to restitution, including Victim J, Victim G, Victim S, Victim G.B., Victim I, Victim E, Victim M, Victim P, and Victim P.W.

The parties acknowledge that determination of the identities, addresses and loss amounts for all victims in this matter is a complicated and time consuming process. To that end, defendant agrees, pursuant to 18 U.S.C. § 3664(d)(5), that the court may defer the imposition of

restitution until after the sentencing; however, defendant specifically waives the 90 day provision found at 18 U.S.C. § 3664(d)(5) and consents to the entry of any orders pertaining to restitution after sentencing without limitation.

17. Forfeiture Agreement

The defendant understands that the forfeiture of assets is part of the sentence that must be imposed in this case. The defendant agrees to forfeit all interests in any sex trafficking asset that the defendant owns or over which the defendant exercises control, directly or indirectly, as well as any property that is traceable to, derived from, fungible with, or a substitute for property that constitutes the proceeds of the offense, or facilitating property or property involved in the offense including but not limited to the following specific property: a Porsche external hard drive bearing serial NL378F7S; Apple iPhone 11 bearing serial DNPZJOUQN6Y1; Apple iPhone 7 bearing serial DNPT902UHX97; Apple iPhone 8 bearing serial C8PX41DMJC6N; and Apple Macbook Pro bearing serial C02SP3NTGTF1.

The defendant understands that if assets subject to forfeiture are not available to the United States to be forfeited, the Court must enter a forfeiture money judgment in the amount of the unavailable assets. *United States v. Blackman*, 746 F.3d 137 (4th Cir. 2014).

The defendant further agrees to waive all interest in the asset(s) in any administrative or judicial forfeiture proceeding, whether criminal or civil, state or federal. The defendant agrees to consent to the entry of orders of forfeiture for such property and waives the requirements of Federal Rules of Criminal Procedure 32.2 and 43(a) regarding notice of the forfeiture in the charging instrument, announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment. Defendant admits and agrees that the conduct described in the

charging instrument and Statement of Facts provides a sufficient factual and statutory basis for the forfeiture of the property sought by the government.

18. Waiver of Further Review of Forfeiture

The defendant further agrees to waive all constitutional and statutory challenges to forfeiture in any manner (including direct appeal, habeas corpus, or any other means) to any forfeiture carried out in accordance with this Plea Agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment. The defendant also waives any failure by the Court to advise the defendant of any applicable forfeiture at the time the guilty plea is accepted as required by Rule 11(b)(1)(J). The defendant agrees to take all steps as requested by the United States to pass clear title to forfeitable assets to the United States, and to testify truthfully in any judicial forfeiture proceeding. The defendant understands and agrees that all property covered by this agreement is subject to forfeiture as property facilitating illegal conduct.

19. The Defendant's Obligations Regarding Assets Subject to Forfeiture

Upon request by the government, the defendant agrees to identify all assets in which the defendant had any interest or over which the defendant exercises or exercised control, directly or indirectly, within the past four years from the date of the defendant's signature on this Plea Agreement. The defendant agrees to take all steps as requested by the United States to obtain from any other parties by any lawful means any records of assets owned at any time by the defendant. The defendant agrees to undergo any polygraph examination the United States may choose to administer concerning such assets and to provide and/or consent to the release of the defendant's tax returns for the previous five years. The defendant understands that the proceeds

of the offense(s) are subject to forfeiture and cannot be used for any purpose, to include attorney's fees and living expenses.

20. Sex Offender Registration and Notification Act

The defendant has been advised, and understands, that under the Sex Offender Registration and Notification Act, a federal law, the defendant must register and keep the registration current in each of the following jurisdictions: where the defendant resides; is an employee; or is a student. The defendant understands that the requirements for registration include providing true name, residence address, and names and addresses of any places where the defendant is or will be an employee or a student, among other information. The defendant further understands that the requirement to keep the registration current includes informing at least one jurisdiction in which the defendant resides, is an employee, or is a student not later than three business days after any change of the defendant's name, residence, employment, or student status. The defendant has been advised, and understands, that failure to comply with these obligations subjects the defendant to prosecution for failure to register under federal law, 18 U.S.C. § 2250, which is punishable by a fine or imprisonment, or both.

21. Breach of the Plea Agreement and Remedies

This agreement is effective when signed by the defendant, the defendant's attorney, and an attorney for the United States. The defendant agrees to entry of this plea agreement at the date and time scheduled with the Court by the United States (in consultation with the defendant's attorney). If the defendant withdraws from this agreement, or commits or attempts to commit

any additional federal, state or local crimes, or intentionally gives materially false, incomplete, or misleading testimony or information, or otherwise violates any provision of this agreement, then:

- a. The United States will be released from its obligations under this agreement. The defendant, however, may not withdraw the guilty plea entered pursuant to this agreement.
- b. The defendant will be subject to prosecution for any federal criminal violation, including, but not limited to, perjury and obstruction of justice, that is not time-barred by the applicable statute of limitations on the date this agreement is signed. Notwithstanding the subsequent expiration of the statute of limitations, in any such prosecution, the defendant agrees to waive any statute-of-limitations defense.
- c. Any prosecution, including the prosecution that is the subject of this agreement, may be premised upon any information provided, or statements made, by the defendant, and all such information, statements, and leads derived therefrom may be used against the defendant. The defendant waives any right to claim that statements made before or after the date of this agreement, including the Statement of Facts accompanying this agreement or adopted by the defendant and any other statements made pursuant to this or any other agreement with the United States, should be excluded or suppressed under Fed. R. Evid. 410, Fed. R. Crim. P. 11(f), the Sentencing Guidelines, or any other provision of the Constitution or federal law.

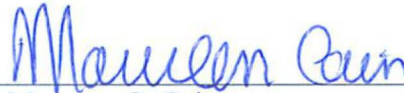
Any alleged breach of this agreement by either party shall be determined by the Court in an appropriate proceeding at which the defendant's disclosures and documentary evidence shall be admissible and at which the moving party shall be required to establish a breach of the plea agreement by a preponderance of the evidence.

22. Nature of the Agreement and Modifications

This written agreement constitutes the complete plea agreement between the United States, the defendant, and the defendant's counsel. The defendant and the defendant's attorney acknowledge that no threats, promises, or representations have been made, nor agreements

reached, other than those set forth in writing in this Plea Agreement or any associated documents filed with the Court, to cause the defendant to plead guilty. Any modification of this Plea Agreement shall be valid only as set forth in writing in a supplemental or revised plea agreement signed by all parties.

JESS ABER
UNITED STATES ATTORNEY




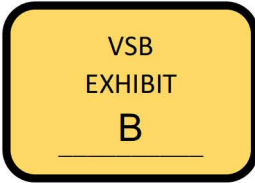
By: Maureen C. Cain
Assistant United States Attorney
Whitney Kramer
Special Assistant United States Attorney

Defendant's Signature: I hereby agree that I have consulted with my attorney and fully understand all rights with respect to the pending criminal indictment. Further, I fully understand all rights with respect to Title 18, United States Code, Section 3553 and the provisions of the Sentencing Guidelines Manual that may apply in my case. I have read this plea agreement and carefully reviewed every part of it with my attorney. I understand this agreement and voluntarily agree to it.

Date: 10/18/21 
Defendant Matthew Erausquin

Defense Counsel Signature: I am counsel for the defendant in this case. I have fully explained to the defendant the defendant's rights with respect to the pending indictment. Further, I have reviewed Title 18, United States Code, Section 3553 and the Sentencing Guidelines Manual, and I have fully explained to the defendant the provisions that may apply in this case. I have carefully reviewed every part of this plea agreement with the defendant. To my knowledge, the defendant's decision to enter into this agreement is an informed and voluntary one.

Date: 10-18-21 
Frank Salvato, Esq.
Chris Amolsch, Esq.
Edward MacMahon, Esq.
Attorneys for Matthew Erausquin



IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	No. 1:21-CR-49 CMH
)	
v.)	
)	
MATTHEW J. ERAUSQUIN,)	
a/k/a MATT HAMMOND)	
)	
Defendant.)	



STATEMENT OF FACTS

The parties stipulate that the allegations in Counts One through Count Six of the Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt with admissible and credible evidence.

1. From on or about June 15, 2017 through on or about September 10, 2018, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM J, having had a reasonable opportunity to observe VICTIM J and knowing and in reckless disregard that VICTIM J was under the age of 18 years old and knowing and in reckless disregard that VICTIM J would be caused to engage in a commercial sex act.

2. From on or about June 15, 2017 through on or about July 2018, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM G, having had a reasonable opportunity to observe VICTIM G and knowing and in reckless disregard that VICTIM

G was under the age of 18 years old and knowing and in reckless disregard that VICTIM G would be caused to engage in a commercial sex act.

3. From on or about July 21, 2017 through on or about November 2017, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM S, having had a reasonable opportunity to observe VICTIM S and knowing and in reckless disregard that VICTIM S was under the age of 18 years old and knowing and in reckless disregard that VICTIM S would be caused to engage in a commercial sex act.

4. From on or about August 4, 2017 through on or about November 2017, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM G.B., having had a reasonable opportunity to observe VICTIM G.B. and knowing and in reckless disregard that VICTIM G.B. was under the age of 18 years old and knowing and in reckless disregard that VICTIM G.B. would be caused to engage in a commercial sex act.

5. From on or about April 1, 2019 through on or about April 24, 2019, within the Eastern District of Virginia, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a "MATT HAMMOND," did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM I, having had a reasonable opportunity to observe VICTIM I and knowing and in reckless disregard that VICTIM I was under the age of 18 years old and knowing and in reckless disregard that VICTIM I would be caused to engage in a commercial sex act.

6. From on or about September 1, 2019 through on or about October 9, 2019, within the Eastern District of Virginia and elsewhere, in and affecting interstate commerce, the defendant, MATTHEW J. ERAUSQUIN, a/k/a “MATT HAMMOND,” did knowingly recruit, entice, harbor, transport, obtain, maintain, solicit, and patronize a minor herein referred to as VICTIM E, having had a reasonable opportunity to observe VICTIM E and knowing and in reckless disregard that VICTIM E was under the age of 18 years old and knowing and in reckless disregard that VICTIM E would be caused to engage in a commercial sex act.

7. In or about June, 2017, the defendant, MATTHEW ERAUSQUIN, met Victim J on the website SeekingArrangement.com, a website that advertised itself as a place where “Sugar Daddies” can meet “Sugar Babies.” To set up a profile, SeekingArrangement.com requires a person to state they are at least 18 years old and Victim J so stated in her profile.

8. On June 15, 2017, ERAUSQUIN sent Victim J \$200 through his Matt Hammond Paypal/Venmo account after requesting and receiving a video of Victim J sucking on a tube of toothpaste.

9. The next day, ERAUSQUIN ordered and paid for an Uber car ride to pick up Victim J and Victim G and transported them to Arlington, Virginia. ERAUSQUIN bought lunch for both Victim J and Victim G. Victim J and Victim G represented that they were 18 years old. After lunch, the three of them walked back to his apartment in Clarendon, Virginia. While at his apartment, he engaged in sex acts with both girls. Afterwards, he paid Victim J and Victim G approximately \$800 each. Victim J and Victim G were 16 years old during this first encounter.

10. ERAUSQUIN had Victim J and Victim G over at his apartment multiple times when they were minors. He paid for sexual activity each time, which included vaginal sexual intercourse and/or oral sex being performed on him. He also provided Victim J and Victim G marijuana,

including THC infused chocolate bar edibles.

11. Uber records linked to ERAUSQUIN's uber account reveal he ordered and paid for multiple car rides to be sent to the vicinity of Victim J's home address to then be transported to the vicinity of his Clarendon apartment on the following dates: June 16, 2017, September 1, 2017, September 19, 2017, and August 10, 2018. Victim J and Victim G were minors for each of the above uber car ride dates.

12. On or about July 21, 2017, Victim J, Victim G, and Victim S went to ERAUSQUIN's apartment together. A representation was made that Victim S was 18 years old. While at his apartment, ERAUSQUIN engaged in vaginal sexual intercourse with Victim S and directed Victim J and Victim G to engage in other sexual acts with each other and/or with him. Thereafter, he paid each girl approximately \$800. Victim S was 16 years old during this first encounter.

13. On or about August 4, 2017, ERAUSQUIN ordered an Uber car ride to transport both Victim S and Victim G.B. to his apartment. He sent the Uber car ride to the vicinity of Victim G.B.'s residence. A representation was made that Victim G.B. was 18. While at his residence, ERAUSQUIN engaged in vaginal sexual intercourse with Victim G.B. and Victim S. He also had both girls engage in oral sex with him. Thereafter, he paid \$800 each and then ordered an Uber to transport them to Tyson's Mall. Victim G.B. was 16 years old during this first encounter and had silver orthodontic braces on her top and bottom teeth. Victim S was also 16 years old.

14. During a court authorized search of ERAUSQUIN's residence in Miami, Florida, law enforcement recovered five videos on a Seagate Hard Drive showing ERAUSQUIN engaged in vaginal sexual intercourse with the minor victims and oral sex being performed on him by at least one minor victim in each video. The videos were created in his apartment in Clarendon,

Virginia. The videos were saved in a folder on the hard drive titled “Escapades.” The below table contains the video file name, the creation date, and which victims were depicted:

Name	Date Created	Victims Depicted
Escapade.mov	7/21/2017 1:37:06PM (2017-07-21 17:37:06 UTC)	J, G, S
Escapade-2.mov	8/4/2017 4:07:44PM (2017-08-04 20:07:44 UTC)	S, G.B.
Escapade-3.mov	9/1/2017 4:45:25PM (2017-09-01 20:45:25 UTC)	J, G
Escapade-4.mov	9/19/2017 11:03:40PM (2017-09-20 03:03:40 UTC)	J, G
Escapade-5.mov	11/2/2017 4:01:04PM (2017-11-02 20:01:04 UTC)	J, G

15. On April 9, 2019 and April 12, 2019, ERAUSQUIN ordered an Uber car ride to transport Victim I and Victim G.B. to his apartment. During the two encounters, Victim I was 16 years old. Victim G.B. was 18 years old. Victim G.B. previously represented that Victim I was 18 years old and in high school. Victim G.B. was friends on Instagram with both ERAUSQUIN and Victim I when she made the representation regarding Victim I’s age. During both encounters with Victim I and Victim G.B., ERAUSQUIN engaged in sexual activity with both girls, including vaginal sexual intercourse with Victim I. He paid Victim I and Victim G.B. \$500 each during both encounters. During one of the encounters, he gave Victim I and Victim G.B. marijuana and two purses from the retail store Tiffany & Co.

16. On July 31, 2019, Victim J forwarded to ERAUSQUIN a message she received from Victim GB. The forwarded message to ERAUSQUIN stated in part:

Victim GB: U know he's being investigated right?

Victim GB: So just be careful

Victim J: Investigated for what?

Victim GB: For money fraud and apparently something about having sex w underage girls

Victim GB: Bc one of the girls I knew who went to him was 17 and she told her parentsThe police came to my house about it like a month ago but I didn't talk to them

17. After receiving the forwarded message, ERAUSQUIN responded in part:

+13058983522 Matt (7/31/2019): yeah this is the first I'm hearing about the [Victim GB] thing. Everything was cool, even bought her a super nice camera and then suddenly disappeared and blocked me on everything. Didn't understand it but figured she got a bf

+13058983522 Matt (7/31/2019): she brought over one girl but told me she was a senior and was 18

...

+13058983522 Matt (8/5/2019): none of this is worth risking my career for. I have parents in their late 70s that are relying on me to take care of them

18. In or around September, 2019, ERAUSQUIN met 17-year old Victim E on the dating website Tinder. Victim E recalled that ERAUSQUIN was posing as a teenage male on Tinder. Victim E provided her age as 18 years old on Tinder.

19. ERAUSQUIN engaged in sexual activity with Victim E on three occasions at his apartment in Clarendon when she was 17 years old. Victim E informed law enforcement that one time Erasquin sent an uber to the vicinity of her high school to transport her to his residence; one time he picked her up in his own car from the vicinity of her high school, and one time she drove herself to his apartment. After each sexual encounter, he paid her money and/or provided her

drugs.

20. A review of Uber records tied to ERAUSQUIN's account shows a trip dated September 11, 2019 from High School S (where Victim E attended) to ERAUSQUIN's Clarendon apartment. A review of Victim E's phone revealed a photo of a hand holding up several \$100 bills. The photo was date stamped September 11, 2019. Victim E informed law enforcement she received the money from ERAUSQUIN.

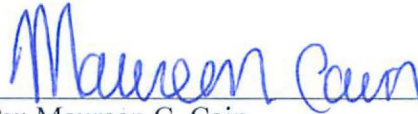
21. Snapchat communications dated September 8, 2019 reveal Defendant telling Victim I he has a "2019 range dark gray." Snapchat communications dated September 17, 2019, further revealed ERAUSQUIN providing his address to Victim E and instructing her where to park.

22. In the event that the Court finds that the defendant has breached this Plea Agreement, this Statement of Facts shall be admissible as a knowing and voluntary confession in any proceeding against the defendant regardless of whether the Plea Agreement is presented to or accepted by a Court. Moreover, the defendant waives any rights that the defendant may have under Fed. R. Crim. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the Statement of Facts in any such proceeding.

23. This Statement of Facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

Respectfully submitted,

JESS ABER
UNITED STATES ATTORNEY

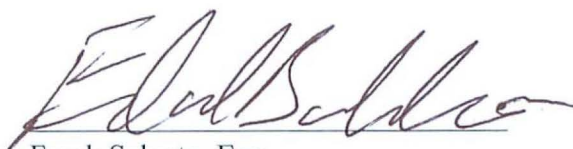


By: Maureen C. Cain
Assistant United States Attorney
Whitney Kramer
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Matthew Erausquin, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


Matthew Erausquin

I am Matthew Erausquin's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Frank Salvato, Esq.
Chris Amolsch, Esq.
Edward MacMahon, Esq.
Attorneys for Matthew Erausquin