

**TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**



**APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL**

\*\*\*\*\*

UNITED STATES OF AMERICA

-v.-

23-MJ-870

DANIEL GALANTER

Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_ Defendant \_\_\_ DOJ

Name: AUSA Elias Laris

Firm Name: U.S. Attorneys Office - EDNY

Address: 271A Cadman Plaza East

Brooklyn, NY 11202

Phone Number: 718-254-6599

E-Mail Address: elias.laris@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_ NO

**If yes, state description of document to be entered on docket sheet:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**MANDATORY CERTIFICATION OF SERVICE:**

**A.)** \_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, **B.)** \_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or **C.)**  This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

10/4/2023

DATE

*Elias Laris*

SIGNATURE

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

**B) If a new application,** the statute, regulation, or other legal basis that authorizes filing under seal

Flight, public safety, and security concerns: \_\_\_\_\_

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.**

DATED: Brooklyn, NEW YORK

October 4, 2023

*Marcia M. Henry*

**U.S. MAGISTRATE JUDGE**

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_

DATE

WK:EL  
F. #2023R00736

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

**TO BE FILED UNDER SEAL**

UNITED STATES OF AMERICA

23-MJ-870

- against -

AFFIDAVIT AND COMPLAINT IN  
SUPPORT OF AN APPLICATION FOR  
AN ARREST WARRANT

DANIEL GALANTER,

Defendant.

(18 U.S.C. § 2252(a)(2))

----- X

EASTERN DISTRICT OF NEW YORK, SS:

THOMAS JACQUES, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about and between September 2018 and May 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DANIEL GALANTER did knowingly and intentionally receive one or more visual depictions using one or more means and facilities of interstate and foreign commerce, to wit: the internet, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to

1. I have been a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) since approximately 2016 and am currently assigned to the New York Office. Since approximately 2020, I have been assigned to the Child Exploitation Investigations Team, and in that capacity, I have investigated violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child pornography cases and have reviewed thousands of photographs depicting children (i.e., individuals under the age of 18) being sexually exploited by adults. I thus have become familiar with some of the ways in which participants in such offenses use the Internet in connection with those crimes.


2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

3. On or about June 10, 2022, a federal search warrant was issued for a Skype account associated with an individual (“Individual-1”) known to law enforcement to engage in the sale of online child pornography, specifically livestream webcam shows involving the sexual abuse and exploitation of children in the individual’s care. See 2:22-MJ-89-KFW (D. Me). A review of Individual-1’s Skype account (“Individual-1’s Account”) revealed that, among other things, the account communicated extensively with a Skype account associated with display name “Daniel Galanter” (the “Galanter Account”).

---

establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. On or about and between September 2018 and May 2022, both dates being approximate and inclusive, the Galanter Account routinely communicated with Individual-1's Account regarding the sale and exchange of images, videos, and live streams depicting the use of a minor engaging in sexually explicit conduct. Some recent examples are provided below.

- a. On or about September 29, 2020, a Skype video call occurred between the Galanter Account and Individual-1's Account. During the call, the Galanter Account sent a message to Individual-1's Account stating "Ok 15 for send first or 25 show me your daughter's asshole first." During the same conversation, the Galanter Account sent a screenshot of the Skype video call to Individual-1's Account. As confirmed by the New York States probation officer supervising the defendant DANIEL GALANTER the individual in the image is GALANTER.
- b. On or about October 22, 2020, a Skype video call occurred between the Galanter Account and Individual-1's Account. During the conference, the Galanter Account messaged Individual-1's Account, providing Western Union transaction number 466-302-6715, and stating "I can't see it's too dark." The Galanter Account then offered additional funds and requested "I want finger and tongue fucking her ass and pussy deeeep" and "I want to see you lick her pussy and ass HARD and DEEP." The Galanter Account later requested that Individual-1 "[s]hit in daughter mouth." Information obtained from Western Union confirmed that funds sent via transaction number 466-302-6715 were sent from a bank account associated with the defendant, DANIEL GALANTER.
- c. On or about August 10, 2021, the Galanter Account sent a message to Individual-1's Account stating "Bb I tell u I want show with  inside pussy and

ass.” In response, Individual-1’s Account sent a video to the Galanter Account, which video depicted Individual-1 using her hands to spread the anus and vagina of a young child. Individual-1 then used a vibrating device against the child’s anus and inserted a dildo into the child’s anus.

- d. On or about October 22, 2022, Individual-1’s Account sent two videos to the Galanter Account depicting minors engaging in sexually explicit conduct. The first video was approximately six minutes long and depicted a minor female spreading her vagina, while laying on a bed. The minor female then removed her clothing and bent over to expose her anus. Subsequently, an adult female laid down next to the minor female and instructed her on how to spread her vagina. The second video was approximately three minutes long and depicted two minor females laying nude on a bed and exposing their vaginas and anuses.

5. Between September 2018 and May 2020, the Galanter Account and Individual-1’s Account exchanged over 3,500 messages and phone calls via Skype.

WHEREFORE, your deponent respectfully requests that the defendant DANIEL GALANTER, be dealt with according to law.

/s/ Thomas Jacques  
\_\_\_\_\_  
THOMAS JACQUES  
Special Agent, United States Department of  
Homeland Security, Homeland Security  
Investigations

telephonically  
Sworn to before me this  
4<sup>th</sup> day of October, 2023

*Marcia M. Henry*  
\_\_\_\_\_  
THE HONORABLE MARCIA HENRY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

DANIEL GALANTER

Case No. 23-MJ-870

)
)
)
)
)
)

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) DANIEL GALANTER

who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

knowing and intentional receipt of one or more visual depictions using one or more means and facilities of interstate and foreign commerce, to wit: the internet, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions being of such conduct, in violation of Title 18 United States Code, Section 2252(a)(2).

Date: October 4, 2023

Marcia M. Henry

Issuing officer's signature

City and state: Brooklyn, NY

Marcia M. Henry, U.S.M.J.

Printed name and title

Return

This warrant was received on (date) , and the person was arrested on (date) at (city and state) .

Date:

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*): \_\_\_\_\_