

KTF:BT
F. # 2024R00832

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2251(a))

DEWITT JOHN,

24 MJ 620

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

AUDRA HAMPSCH, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between March 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DEWITT JOHN did knowingly and intentionally employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a))

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2022. While employed by the FBI, I have investigated federal criminal violations related to cybercrime, child exploitation, and child pornography (as defined in 18 U.S.C. § 2256) (also known, and referred to herein as, “child sexual abuse material”). I am now assigned to the FBI’s Child Exploitation and Human Trafficking Task Force, which investigates individuals suspected of being involved in the online sexual exploitation of children. As part of my duties on the task force, I investigate violations relating to child exploitation and child sexual abuse material, including violations pertaining to the production, possession, distribution, and receipt of child sexual abuse material, as well as the transportation of minors and interstate travel to engage in illicit sexual conduct. I have received training regarding child sexual abuse material and child exploitation, and I have had the opportunity to observe and review numerous examples of child sexual abuse material in all forms of media, including computer media.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation concerning this matter, my review of documents, my discussion with and review of reports from other law enforcement and investigative personnel, and my training and experience. Statements attributable to individuals referenced herein are set forth in sum and substance and in part.

PROBABLE CAUSE

I. Definitions

3. For the purposes of this affidavit, the below terms have the following meanings:

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

a. The terms “minor,” “sexually explicit conduct,” and “visual depiction” are defined as set forth in 18 U.S.C. § 2256; and

b. The term “child pornography” is defined as set forth in 18 U.S.C. § 2256(8), which, in pertinent part, states that “any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where . . . the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct. . . .”² Child pornography is also commonly referred to, and referred to herein, as “child sexual abuse material.”

II. The Defendant DEWITT JOHN Solicited Sexually Explicit Materials from 13-Year-Old Girls Using the Subject Accounts

4. The FBI has been investigating the defendant DEWITT JOHN for sexual exploitation of children and the production, possession, distribution, and receipt of child sexual abuse material, among other things. From at least in or about March 2024 through April 2024, JOHN used the internet to groom two minor girls, whom he repeatedly paid to send him sexually explicit images and videos of themselves. During this time, the minor girls (who are referred to herein as Jane Doe 1 and Jane Doe 2) were both 13 years old and living in Alvin, Texas. JOHN, who resides in Brooklyn, New York, is 31 years old.

5. In or about March 2024, the defendant DEWITT JOHN met Jane Doe 1 in a Reddit forum for teenagers called “Am I ugly/teens.” Jane Doe 1 told investigators that she posted topless images of herself in this Reddit forum, and that at least one of her posts included

² 18 U.S.C. § 2256(8); see also Ashcroft v. Free Speech Coalition, 535 U.S. 234 (2002) (analyzing constitutional validity of the definitions set forth in 18 U.S.C. § 2256(8)).

her age. Jane Doe 1 recalled that JOHN responded to her on Reddit and said he would give her money in exchange for nude photographs of herself.

6. By on or about March 28, 2024, the defendant DEWITT JOHN began communicating with Jane Doe 1 on Instagram via a user account known to me (“User Account 1” or “UA1”) and on iMessage³ via an email account known to me (“User Account 2” or “UA2”) (collectively, the “Subject Accounts”).⁴

7. On or about the evening of March 28, 2024, the defendant DEWITT JOHN, using the Instagram account UA1, asked Jane Doe 1 to message him on iMessage at UA2. Subsequently, JOHN spent several hours messaging Jane Doe 1 on iMessage; among other things, he asked Jane Doe 1 if she had a “card” on Cash App, which is an online payment service that allows users to send and receive money.⁵ When Jane Doe 1 replied that she did, JOHN responded, “Okay. So you’re good then.”

8. After a brief further exchange, and at the defendant DEWITT JOHN’s request, Jane Doe 1 sent JOHN, via iMessage, a video of herself engaging in sexually explicit conduct. In the video, Jane Doe 1 undresses and shows the camera her rear end. After receiving this video, JOHN wrote, “How much[?]” When Jane Doe 1 asked how much he

³ iMessage is a messaging service that allows Apple users to send texts, photos, and videos to other Apple devices over Wi-Fi or cellular data. iMessages can be sent via the user’s phone number, Apple ID (which can be an email address), or any additional verified email address that is linked to the user’s Apple ID.

⁴ Several facts confirm that the defendant DEWITT JOHN used the Instagram account UA1 and the email account UA2 to communicate with Jane Doe 1 and 2. These facts are described in paragraphs 15-16 below.

⁵ The defendant DEWITT JOHN and Jane Doe 1 also discussed JOHN’S career, among other topics. After explaining that he worked in “IT,” JOHN asked what Jane Doe 1’s parents did for a living and noted that it was “[w]ay to early for [Jane Doe 1] to decide” on her own career.

thought he should pay her, JOHN told Jane Doe 1, “Well if you want to make it interesting If you want to make something special for me. POV video of you riding something, front facing camera. Tell daddy how much you want him to fuck you.” Jane Doe 1 responded by asking JOHN how much he would pay her for this new video. JOHN replied, “I give small at a time.” JOHN then sent Jane Doe 1 \$20 via a Cash App account known to me (the “Cash App Account”)

9. From on or about March 28, 2024 to March 31, 2024, the defendant DEWITT JOHN continued to message Jane Doe 1 on iMessage and Instagram via the Subject Accounts. Among other things, JOHN asked Jane Doe 1 about her daily activities, which she told him included “ma[king] the soccer team” recently and “playing outside” with her friends and siblings, one of whom, she told JOHN, was nine years old.

10. On or about March 31, 2024, the defendant DEWITT JOHN again asked Jane Doe 1 to send him the video of her “riding something” that he initially asked for on March 28. In response, Jane Doe 1 sent JOHN, via Instagram, a video of herself masturbating. Upon receiving this second video of Jane Doe 1 engaging in sexual conduct, the defendant DEWITT JOHN said: “Send video on iMessage.” In response, Jane Doe 1 asked whether JOHN could see the video that he asked for, and whether she “did something wrong.” JOHN responded: “Nope. Was cool. When i said riding i meant like a makeshift dildo. Something like that[.] Also you’re fit.” In response to this new request, Jane Doe 1 sent JOHN several messages in quick succession, including: “I really don’t want to,” “Do I have to,” “I don’t feel comfortable with that,” and “I’m only 13.” JOHN replied: “Oh. Thought you were older. You’ve never tried anything. Does not have to be anything big.” Jane Doe 1 responded again, “I’m scared tho.” JOHN said, “A marker? Its okay though.”

11. Approximately 15 minutes later, Jane Doe 1 sent the defendant DEWITT JOHN two additional videos on iMessage. In the first, Jane Doe 1 inserts a small green vibrator into her vagina. In the second, she inserts her fingers into her vagina.

12. On or about April 12, 2024, Jane Doe 1 messaged the defendant DEWITT JOHN, via iMessage, that one of her friends was also willing to send him sexually explicit images and videos in exchange for money. Jane Doe 1 then provided JOHN with Jane Doe 2's Instagram handle, and JOHN began messaging Jane Doe 2 on Instagram via UA1. After introducing himself as "dewitt," JOHN asked Jane Doe 2 whether she was "13 as well." Jane Doe 2 replied, among other things: "yep! i have one class with [Jane Doe 1] used to have 2 but then we got switched[.]"

13. From at least on or about April 13, 2024 to at least on or about April 18, 2024, the defendant DEWITT JOHN paid Jane Doe 2, via Cash App, for several sexually explicit images of herself. JOHN received these images from Jane Doe 2 on Instagram, via UA1, consistent with the interactions between JOHN and Jane Doe 1.

III. Attribution of the Subject Accounts to the Defendant DEWITT JOHN

14. The facts set forth below establish that the defendant DEWITT JOHN used the Subject Accounts to communicate with Jane Doe 1 and 2.

15. With respect to the Instagram account UA1:

a. As noted above, the Instagram user communicating with Jane Doe 2 via UA1 introduced himself as "dewitt."

b. Instagram records show that UA1 used the Internet Protocol address ("IP address") 71.167.159.94 in or about March and April of 2024, including on or about March 28, 2024, when Jane Doe 1 sent the first video of herself engaging in sexually explicit

conduct. This IP address is registered to “DEWITT JOHN” at an address known to me where the defendant DEWITT JOHN resides (the “Defendant’s Address”) and an email account known to me (“User Account 3” or “UA3”).

c. Instagram records show that UA1 is also registered to the email address UA3. Microsoft⁶ records show that UA3 used the same IP address (71.167.159.94), registered to the defendant DEWITT JOHN at the Defendant’s Address, as UA1 several times in or about March and April 2024. Additionally, UA3 used another IP address (71.167.159.80) in or about March and April 2024 that is also registered to “DEWITT JOHN” at the Defendant’s Address.

16. With respect to the email account UA2, which was used to communicate with Jane Doe 1 on iMessage:

a. According to Apple records, UA2 is an additional verified email address of an Apple ID known to me (“User Account 4” or “UA4”), which is registered to “Dewitt John” at the Defendant’s Address.⁷ Based on my training and experience, I understand that Apple users may send and receive iMessages via any verified additional email address linked to their Apple ID.

b. In August 2024, UA4 used the same IP address referenced above (71.167.159.94), which is registered to the defendant DEWITT JOHN at the Defendant’s Address.

⁶ Hotmail is one of Microsoft’s email services.

⁷ Moreover, one of the other additional verified email addresses for UA4 is UA3, and Microsoft records show that the registered payment method for UA3 is a PayPal account under the same name as UA4.

c. Google records show that the Google account for UA2 is registered to the Google Pay and Billing Customer “Dewitt John” with a recovery phone number known to me (the “Defendant’s Phone Number”). This phone number is registered to an individual known to me (“Individual 1”) at the Defendant’s Address. Individual 1 is the defendant DEWITT JOHN’s parent, whom JOHN lives with at the Defendant’s Address.

d. UA4, which, as mentioned above, is registered under the name “Dewitt John,” has the same verified phone number as the recovery phone number for UA2 (the Defendant’s Phone Number).

IV. Conclusion

WHEREFORE, your deponent respectfully requests that the defendant DEWITT JOHN be dealt with according to law and arrested.

/s/ Audra Hampsch
AUDRA HAMPSCH
Special Agent, Federal Bureau of Investigation

Sworn to before me this
19th day of November, 2024



THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK