UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. James B. Clark, III
	:	
v.	:	Mag. No. 23-12257
	:	
MATTHEW T. WILLIAMS	:	**CRIMINAL COMPLAINT**

I, Jaclyn Duchene, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Jaclyn Duchene

Special Agent Jaclyn Duchene
U.S. Department of Homeland Security
Homeland Security Investigations

Special Agent Jaclyn Duchene attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) on November 1, 2023.

s/ James B. Clark, III

Honorable James B. Clark, III
United States Magistrate Judge

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Possession of Child Pornography)

From on or about February 9, 2023, through on or about November 1, 2023, in Union County, in the District of New Jersey and elsewhere, the defendant,

MATTHEW T. WILLIAMS,

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, after having previously been convicted, in Virgil Town Court, Criminal Part, of sexual misconduct, in violation of N.Y. Penal Law § 130.20(1).

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

ATTACHMENT B

I, Jaclyn Duchene, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. Defendant Matthew T. Williams ("WILLIAMS") was a resident of Westfield, New Jersey. He was previously convicted in Virgil Town Court, Criminal Part, in the State of New York, of sexual misconduct, in violation of N.Y. Penal Law § 130.20(1), which conviction relates to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward.

The Investigation

2. From on or about February 9, 2023 to on or about September 12, 2023, law enforcement conducted undercover online sessions (the "Sessions") using a publicly available peer-to-peer ("P2P") software application program (the "P2P Program"). P2P is a method of communication available to Internet users through the use of special software. The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together. Generally, when P2P software is installed on a computer, the user is directed to specify a "shared" folder. All files placed in that user's "shared" folder are available to anyone on the worldwide network for download. A person interested in sharing child pornography with others in the P2P network need only place those files in his or her "shared" folders. Those child pornography files are then available to all users of the P2P network for download regardless of their physical location. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce.

3. The P2P Program allows users to connect to and share, search, and download content. The version used by law enforcement allows law enforcement to determine the IP address through which target computers access the Internet.

4. During the Sessions, a computer user (the "Sessions Computer") shared multiple files of child pornography using the P2P Program. The undercover law enforcement officer established a direct connection to the

Sessions Computer. Several of the files shared by the Sessions Computer each bore a hash value that has been identified by law enforcement to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the Sessions by the Sessions Computer using an IP Address (the "Sessions IP Address"). Video files and images of child pornography were available from the Sessions IP Address, which other users accessing the P2P Network could download.

5. More specifically, during the Sessions, law enforcement downloaded approximately 41 video files containing child pornography from the Sessions Computer, which was utilizing the Sessions IP Address. The video and image files included multiple visual depictions of prepubescent children engaged in sexual acts alone and with adults, including the following representative examples:

FILE NAME	DESCRIPTION
[Video-1]	This video, in full, is approximately 28 minutes. This video captures a minor female exposing her genitals and masturbating. This video file was downloaded by law enforcement on or about August 30, 2023.
[Video-2]	This video, in full, is approximately 16 minutes and 40 seconds. It captures a prepubescent female exposing her genitals and penetrating her vagina and anus with her fingers. The video also presents a prepubescent minor female performing oral sex on an adult male. This video was downloaded by law enforcement on or about August 14, 2023.

6. Law enforcement determined through investigation that the Sessions IP Address was assigned, at the general time of the Sessions, to an account registered to a residence in Westfield, New Jersey (the "Residence"). Law enforcement then determined through investigation that the Residence was occupied by WILLIAMS.

7. On or about November 1, 2023, law enforcement executed a lawfully obtained search warrant at the Residence. During the search of the Residence, law enforcement seized, among other things, a laptop computer (the "Seized Computer") and an external hard drive (the "Storage Device") connected to the Seized Computer.

8. At the time of the search, a peer-to-peer software application program was open on the Seized Computer and was downloading child

pornography. No other resident was present at the Residence. In a voluntary and post-*Miranda* interview, WILLIAMS stated to law enforcement, in sum and substance, that he was the sole occupant of the Residence and the sole owner and user of the Seized Computer.

9. A preliminary review of the Storage Device—which was plugged into the Seized Computer—revealed approximately 40 videos appearing to depict child pornography.

10. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography files described in Paragraph 5 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer—more specifically, the images were downloaded from and transmitted via the Internet in the manner described above.