

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ROSS LANVIN,

Defendant.

25 MAG 534

**COMPLAINT**

Violations of 18 U.S.C.

§§ 2252A(a)(5)(B),  
2252A(b)(2), and 2

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

Caitlin Steele, being duly sworn, deposes and says that she is a Task Force Officer (“TFO”) with the U.S. Department of Homeland Security, Homeland Security Investigations (“HSI”), and charges as follows:

**COUNT ONE**

**(Possession of Child Pornography)**

1. From at least on or about September 16, 2021 through at least on or about December 20, 2024, in the Southern District of New York and elsewhere, ROSS LANVIN, the defendant, knowingly possessed and accessed with intent to view, and attempted to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that involved a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, LANVIN possessed on at least one electronic device in New York, New York images and videos of child pornography, including images and videos of child pornography that involved prepubescent minors and minors who had not attained 12 years of age.

(Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), and 2.)

**COUNT TWO**

**(Possession of Child Pornography)**

2. On or about February 13, 2025, in the Southern District of New York and elsewhere, ROSS LANVIN, the defendant, knowingly possessed and accessed with intent to view, and attempted to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that involved a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting

interstate and foreign commerce by any means, including by computer, to wit, LANVIN possessed on at least one electronic device in New York, New York images and videos of child pornography, including images and videos of child pornography that involved prepubescent minors and minors who had not attained 12 years of age.

(Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

1. I have worked for the New York City Police Department (the “NYPD”) for approximately eleven years and have been a Detective for approximately five years. I have been an HSI TFO for approximately three years. As a Detective and a TFO, I have been assigned to investigate violations of criminal law relating to child pornography and the sexual exploitation of children.

2. I have been personally involved in the investigation of this matter. I am familiar with the information contained in this Complaint based on my participation in the investigation, my review of documents, my conversations with other law enforcement officers, and my training and experience. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included the details of every aspect of the investigation. Where actions, conversations, and statements of others are related herein, they are related in substance and in part, except where otherwise indicated.

### **Child Pornography in the Subject Google Account**

3. Based on my involvement in this investigation, including conversations with other law enforcement officers, review of documents and communications, and review of publicly available information, I have learned the following:

a. The National Center for Missing and Exploited Children (“NCMEC”) is a private, non-profit organization established by the United States Congress. NCMEC works with companies such as Google in their efforts to reduce the distribution of child pornography on the Internet. NCMEC receives referrals from companies regarding the discovery of apparent child pornography in accounts maintained by those companies and sends those referrals to law enforcement.

b. Between in or about December 21, 2024 and December 26, 2024, Google submitted at least six referrals to NCMEC reporting that the Google Drive for a particular Google account (the “Subject Google Account”) contained apparent child pornography.

c. In total, Google provided NCMEC with approximately 150 images and 90 videos that Google reported constituted apparent or unconfirmed child pornography, or were otherwise suspected sexually explicit. I have reviewed the files Google submitted to NCMEC. The files include images and videos of nude children, ranging from approximately 3- to 4-year-old children, on the one hand, to pre-pubescent children, on the other hand. The vast majority of the files appear to be child pornography. For example:

- i. A photo of a prepubescent minor approximately 7 to 9 years old being penetrated anally by an adult male penis. The photograph is taken from above the adult male's penis showing a portion of his stomach and inner thighs and the child is manipulated to have their legs folded up toward their stomach. The child's underdeveloped penis is visible in the photograph.
- ii. A photo of a prepubescent male approximately 2 to 3 years old being penetrated anally by an adult male penis. The adult male appears to be utilizing a hand to force his penis into the anus of the minor. The child's inner thighs, underdeveloped testicles, and abdomen are visible in the photo, which is taken from directly above the child's genitals.
- iii. A video depicting an approximately 10- to 13-year-old pubescent male recording himself in the bathroom displaying his anus and masturbating. The child utilizes product from the shower to lubricate his hands and penis and masturbate. He places the bottom open end of a toilet plunger on his erect penis and humps as if he is penetrating it. The child continues to record while the water is running and masturbates, displays his anus to the camera and penetrates himself with his fingers. The child moves the recording device to the floor and attempts to penetrate himself with the wooden handle of the toilet plunger, continues to masturbate, sucks on his toes and licks his feet, and attempts to reach his mouth with his penis and then ends the video.
- iv. A video displaying an approximately 7- to 8-year-old male attempting to penetrate an adult male. The adult male is lying on his stomach on a bed and is recording the video while capturing a portion of his face, back, and buttocks in the frame. The child is straddling the adult male's legs and attempting to spread the adult's buttocks and penetrate the adult. The child is wearing underwear covering his buttocks, but has his penis exposed.

d. The NCMEC referrals indicate that the files Google reported to NCMEC were uploaded to the Subject Google Account on or about September 16, 2021, and that the Subject Google Account was logged into on several occasions between at least May 2024 and December 2024, including from internet protocol ("IP") addresses in the Southern District of New York, as described below.

4. Based on my review of records Google produced pursuant to a judicially authorized search warrant (the "Google Warrant"), I know that the vast majority, if not all, of the images and videos in the Subject Google Account's Google Drive are images and videos of nude children, including child pornography. I know based on my review of the records produced pursuant to the Google Warrant that the Subject Google Account contained at least approximately 1,000 images or videos of child pornography.

**Identification of ROSS LANVIN**

5. I believe that ROSS LANVIN, the defendant, is the user of the Subject Google Account. That conclusion is based on the following, which I have learned from my participation in this investigation, including conversations with other law enforcement officers, review of documents and communications, and review of publicly available information:

a. The Subject Google Account is subscribed to in the name of “Ryan Ryan” with a phone number ending in -8499 (the “8499 Number”). The 8499 Number was “verified” on September 21, 2024, which in my training and experience reflects that the user of the Subject Google Account verified the account by entering a verification code sent to the 8499 Number.

b. Based on my review of records from the phone company that services the 8499 Number, I have learned that the 8499 Number is subscribed to in the name of “Ross Lanvin.”

c. Based on my review of information from an internet service provider, I have learned that multiple IP addresses that were used to access the Subject Google Account between in or about May 2024 and in or about December 2024 were subscribed in the name of “Ross Lanvin” located at an address in Manhattan, New York where LANVIN lives, as described below (the “Lanvin Apartment”).

d. Based on my review of records produced pursuant to the Google Warrant, I know that the files in the Subject Google Account’s Google Drive are in a folder path that includes a folder labeled “Ross.” I also know from these records that, while the Subject Google Account appears to be a “burner” account, *e.g.*, the Google Drive contains primarily child pornography and the email account does not appear to be used for regular communication under LANVIN’s name, the Subject Google Account nonetheless received emails on or about June 13, 2024, September 29, 2024, and December 20, 2024, and those emails were addressed to “Ross Lanvin.”

e. LANVIN is currently a math teacher at a public middle school located in Manhattan, New York (“School-1”). He was employed by the New York City Department of Education (the “DOE”) from in or about 2006 through in or about 2013, and again beginning in or about 2016. The NCMEC referrals indicate that, on or about May 10, 2024, the Subject Google Account was accessed from an IP address that Google reported as associated with the DOE.

f. The Subject Google Account is linked to several email accounts based on Cookie data. Based on my training and experience, accounts are typically linked based on Cookie data if the accounts are accessed on the same electronic device. There are several linked accounts, including multiple “rlanvin” emails as different domain names (presumably corresponding to “Ross Lanvin”), including one that is at the domain @schools.nyc.gov, which I know, based on my training and experience, is a domain used by the DOE.

g. The Subject Google Account has been used to search for lesson plans and other teaching resources, as well as for pornography using search terms such as “young” or “teen boys.” For instance, on or about September 16, 2021, the day that the child pornography was uploaded to the Subject Google Account’s Google Drive, the Subject Google Account was used to search for videos involving “gay teen boys” and also accessed the website

academyforteachers.org, a website for an organization that hosts classes, workshops, and professional development events for teachers in New York City. More recently, on or about November 25, 2024, the Subject Google Account was used to access Gemini, an artificial intelligence platform; on Gemini, the Subject Google Account user wrote, in sum and substance, that the user taught middle school math and needed examples of math problems to give his students in a quiz. On several occasions throughout December 2024, the user of the Subject Google Account searched for various videos on “myvidster,” a pornography platform, using terms like “young boys” and “gay teen.” I have not been able to confirm whether these websites contained child pornography, in part because many of the videos appear to have been taken down.

### **Search of the Lanvin Apartment and LANVIN’s Statements**

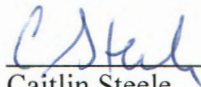
6. On or about February 13, 2025, I participated in a search of the Lanvin Apartment and LANVIN’s person pursuant to a judicially authorized search warrant. LANVIN, the defendant, was present in the Lanvin Apartment during the execution of the search warrant.

7. LANVIN, who was not under arrest at the time, voluntarily agreed to be interviewed by law enforcement. During that interview, LANVIN told law enforcement, in substance and in part, that he lives alone at the Lanvin Apartment and is the only person with access to the Wi-Fi, which is password protected. LANVIN provided law enforcement with the passcode to his tablet, which based on my review I know contained at least four videos constituting child pornography, including:

- a. A video of an approximately 6-year-old prepubescent male fully nude lying down on a bed with his hands behind his head. An adult is recording the video while manipulating and stroking the child’s erect penis and pulling on his testicles.
- b. A video of an adult male manipulating an approximately 6-year-old prepubescent male in several positions throughout the video. The male first penetrates the child while he is on his hands and knees with his finger first and then his penis after utilizing a substance which appears to be saliva as a lubricant. The adult then changes positions himself to be sitting and suspends the child by his waist and back and penetrates him anally. The adult then pushes the child onto his back with the child’s legs in the air and the adult masturbates with the child’s anus and testicles in the video frame.
- c. A video showing a prepubescent male approximately 6 years old has his shorts removed by an adult male who proceeds to perform oral sex on the child. The child is then filmed performing oral sex on an adult male penis. The child is then shown utilizing his hand to manually stimulate an adult penis during ejaculation.
- d. A video of an approximately 10-year-old male child displaying his anus and testicles in close proximity to a camera device utilizing saliva to lubricate his finger and then penetrate his anus, alternating this action with masturbation throughout the video.

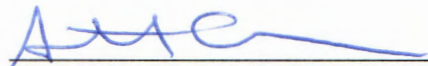
8. After waving his *Miranda* rights and signing a written *Miranda* consent form, LANVIN voluntarily spoke to law enforcement. During this interview, he confirmed that the 8499 Number and one of the “rlanvin” emails were his. LANVIN also admitted that the Subject Google Account was his and that he had access to it as recently as approximately two months ago, at which point he was blocked from accessing it. Finally, LANVIN acknowledged that he had previously accessed child pornography on electronic platforms.

WHEREFORE, I respectfully request that ROSS LANVIN, the defendant, be imprisoned or bailed, as the case may be.



Caitlin Steele  
Task Force Officer  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this 14th day of February, 2025.



THE HONORABLE STEWART D. AARON  
United States Magistrate Judge  
Southern District of New York