

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Joshua DeWitte and Christopher Allan Tisoy

Case No.

25-mj-5141-JGD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 13-15, 2025 in the county of Cambridge in the
 District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2251(a) & (e)

Offense Description

Sexual exploitation of minors, and attempt and conspiracy

This criminal complaint is based on these facts:

See attached Affidavit of HSI Special Agent Brian A. Smith.

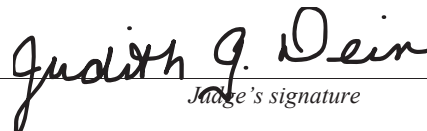
☒ Continued on the attached sheet.

Complainant's signature

Brian A. Smith, HSI Special Agent

Printed name and title

Subscribed and sworn to via telephone in accordance with
 Federal Rule of Criminal Procedure 4.1.

Date: **May 5, 2025**City and state: Boston, Massachusetts

Judge's signature

Hon. Judith G. Dein, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Brian A. Smith, a Special Agent with Homeland Security Investigations, being duly sworn, depose and state the following:

Introduction and Agent Background

1. I am a Special Agent with the Boston office of the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”). I have been an HSI Special Agent since 2021. I am a graduate of the Federal Law Enforcement Training Center in Glynco, Georgia where I received training to become a federal agent; specifically, I received a certification in the Criminal Investigator Training Program and the HSI Special Agent Training Program.

2. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, the transfer of obscene material to minors, and transportation of minors, including but not limited, to violations of 18 U.S.C. §§ 1470, 2422, 2423, 2251, and 2252A. I have received training in the investigation of child pornography, child exploitation, and transportation of minors, and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256). My specialized child exploitation training includes the completion of the Internet Crimes Against Children Investigative Techniques course hosted by the National Criminal Justice Training Center. I have a Master of Science degree in Homeland Security from Endicott College and have received an honorable discharge from the United States Marine Corps after completing 4 years of active-duty service.

3. This affidavit is submitted in support of an application for a criminal complaint charging Joshua DeWitte (“DEWITTE”) (YOB 1975) and Christopher Allan Tisoy (“TISOY”)

(YOB 1998) each with one count of sexual exploitation of minors (and attempt and conspiracy), in violation of 18 U.S.C. §§ 2251(a) and (e).

4. The statements in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit does not contain each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the issuance of the requested criminal complaint.

STATEMENT OF PROBABLE CAUSE

The NCMEC CyberTip and Identification of DEWITTE

5. On December 3, 2024, the Massachusetts State Police Internet Crimes Against Children Task Force received a NCMEC¹ CyberTip Report (“the CyberTip”), which had been submitted to NCMEC by Snapchat on September 17, 2024. The CyberTip reported that on September 16, 2024, at 04:53:40 UTC, a Snapchat account (“the Snapchat Account”) uploaded one file of suspected child pornography (depicting the sexual abuse of a boy who appears to be between approximately eight and 10 years old) to Snapchat from the Snapchat user’s device and then shared this file in a chat.

6. The CyberTip provided information about the Snapchat Account, including the IP addresses associated with the account. Investigators traced one of the IP addresses to Joshua

¹ The National Center for Missing and Exploited Children (“NCMEC”) is a nonprofit organization that, among other things, strives to help find missing children, reduce child exploitation, and prevent child victimization. NCMEC’s CyberTipline serves as the national online clearinghouse for tips and leads about child sexual exploitation and is the method through which the public and electronic service providers (ESPs) may report the enticement of children for sexual acts, extra-familial child sexual molestation, child pornography, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, and misleading words or images on the internet.

DEWITTE and to DEWITTE's Cambridge address.

7. On December 17, 2024, Cambridge Police Department ("CPD") received records from Snapchat. These records showed multiple conversations between September 12 and September 16, 2024, in which the Snapchat Account user identified himself as a 42-year-old man located in Boston, who is married to a woman and who teaches middle school music at a school located close to where he lives.

8. From September 12 through September 16, 2024, the Snapchat Account engaged in conversations that were sexual in nature with users who presented themselves as minors. In those conversations, the Snapchat Account requested nude pictures from the purported minors; sent pictures of what the Snapchat Account user represented to be his own penis to the purported minors; and discussed previous and potential in-person meetups for sexual relations with minors.

9. Investigators located the moment when the Snapchat Account sent the file that was flagged in the CyberTip in a conversation with one user who purported to be a 13-year-old boy. In that same conversation, the Snapchat Account revealed that the username he uses for Snapchat is also the username he uses for Telegram (hereinafter, "the Username").² The Snapchat Account added that he has child pornography videos on his Telegram account.

10. In addition to sending and/or requesting nude pictures, sending child pornography, and discussing prior and potential sexual encounters with minors, the Snapchat Account also paid and offered to pay another Snapchat user ("Other User") to obtain and produce child pornography, and to recruit minor boys, for the Snapchat Account user. Specifically, on September 12, 2024, the Snapchat Account and Other User engaged in the following conversation:

² Telegram is an end-to-end encrypted cloud-based social media and instant messaging service that allows users to exchange messages, store and share media and files, and hold private and group voice or video calls.

Other User: Did he add you daddy?

Snapchat Account: Yes. But no response
When is your vid coming?

Other User: I'll try and do it soon I can do it without being shaven if that's okay for now daddy
I found a 15 year old I sent him your @
Did you get added by him ?
@XXXXXXXXXX
Daddy ?

Snapchat Account: Added him
We'll see where it goes

Other User: @XXXXXXXXXXXX here's a 14 year old
It's a lot harder to find younger guys than I thought
Is there anything else I can do for money I can continue to look for guys but it's quite hard

Snapchat Account: I'll think about it
Vids of you another boy?

Other User: Me and another boy?

Snapchat Account: Yea

Other User: Maybe I can try and get vid's and pics of younger guys and send them to you would that work?
Would you like me to try and get vid's and pics of younger guys?

Snapchat Account: Maybe. Have to be around 14 because I have lots of vids of older teens

Other User: I can maybe get a dick pic of that 15 year old would that work?

Snapchat Account: No. Sry, I want full body and face if I'm going to pay
You really need the money?

Other User: Yeah I do sorry

Snapchat Account: Love vids of boys jerking and cumming
Solo vids

Or if you do anything with another guy. Doesn't have to be sex

Other User: My penis isn't shaved but I can do a cumming video for you

Snapchat Account: Well, First do the full vid I paid for and we'll see. Ok?
I'll tip you if you do a full strip from clothes and then jerk and cum
Like a good \$25 tip

Other User: Alrighty daddy I can be your slutty if you think of videos I can make for you for money I'll do it
I'll still try get vid's of younger guys too

Snapchat Account: Perfect

Other User: I also found a 16 year old that might be interested in adding and letting you use him

Snapchat Account: Yea

Other User: @XXXXXXXXXXXXXXXXX
He's 16 is you wanna use him
Daddy did you add him

Snapchat Account: I did

Other User: Hey that 16 year old gave me some pics to send to you
[Other User sends ExternalMedia—three images: an image of a nude male with his penis exposed, an image of a male's bare chest wearing a silver chain, and an image of a male lying on a bed, wearing grey bottoms and a white t-shirt, with his buttocks exposed—to the Snapchat Account]
I hope you like them
Are you able to pay for that guy since he's gonna continue to send

Snapchat Account: Well, I want younger tbh
Way too old looking

Other User: Would you pay if I can get some nude vid's of a 15 yr old

Snapchat Account: Prefer 14 under

Other User: It's really hard to find that but I'll try

Snapchat Account: Can't wait to see your video
I know it's hard
I get lots of 15 and older
but easier to find
Try at why I'll pay you&

Other User: I'll try and do it today

Snapchat Account: That is why I pay you

11. Based in part on the information above, investigators obtained a state-court warrant to search DEWITTE's residence and executed the warrant on January 9, 2025. During the search of DEWITTE's residence, officers encountered DEWITTE. DEWITTE was provided and waived his *Miranda* rights and elected to speak with law enforcement officers.

12. When interviewed, DEWITTE stated that he uses Snapchat and that he generally uses the Username as a username for other sites or applications but that he could not remember his Snapchat username specifically. DEWITTE also stated that he had a Telegram account and provided the phone number associated with that account to investigators. The phone number DEWITTE provided is the phone number associated with the IP address Snapchat flagged in the CyberTip.

13. That day, DEWITTE was arrested and charged in Cambridge District Court with six counts of disseminating obscene material to a child, one count of distribution of material depicting a child in a sexual act, and one count of possession of child pornography.

The Telegram Conversations Between DEWITTE and "Chris"

14. During the search, officers seized several devices, including DEWITTE's personal cell phone. On April 30, 2025, federal investigators obtained a federal warrant to search the devices. *See* 25-mj-5091-JGD. The affidavit submitted in support of that warrant is attached hereto as Sealed Exhibit 1 and incorporated herein.

15. The forensic examination of DEWITTE's cell phone revealed that the Telegram application was installed on the device and was signed into an account that uses the Username. The name on the account was "JP."

16. Within the Telegram application, investigators found a conversation between DEWITTE and a Telegram user ("Telegram User 1"). On December 1, 2024, DEWITTE shared three video files with Telegram User 1 and stated, "I was in the Philippines. Most of my vids are from there and that's where I was with a 10 yo and 12. 16 yo in Japan and Korea." In response to Telegram User 1 stating, "I hope there are more boys to discover," DEWITTE explained, "I have a contact there. . . . He only records vids of the boys or arranges for my visit."

17. Investigators also found a conversation between DEWITTE and a Telegram user with the account name "Chris." The portion of the conversation located in forensic review of the phone took place from around December 9, 2024, through January 7, 2025. A review of the conversation revealed that Chris is from the Philippines but was not in the Philippines at the time of the conversation, and that DEWITTE refers to him as "Chris." In the conversation, DEWITTE and Chris arranged for the production of child pornography videos involving minor boys. Specifically, DEWITTE provided Chris with instructions for what DEWITTE wanted depicted in video, Chris then relayed those instructions to minor boys to create a video, and DEWITTE then paid Chris for the video. In the paragraphs that follow, I include excerpts of the conversation.

18. Excerpt from December 13, 2024:

JP: Do you think MINOR 1³ will be able to find another young boy?

³ The names of MINOR 1 and other anonymized individuals mentioned in DEWITTE's conversation with Chris are known to law enforcement. Their names are redacted to protect their identities because law enforcement believes them to be minors. As to MINOR 1, MINOR 2, and MINOR 4, specifically, Chris described them as "under age." The conversation revealed that MINORS 1, 2, 3, and 4 are located in the Philippines.

Chris: Josh
MINOR 1 wanna fuck MINOR 2 anal
bareback and ass spitting

JP: MINOR 1 wants to!?!?!?
I thought he wasn't into that
Who will film them?
I don't want the camera on the ground. I want lots of angles
Also I insist on lube
For MINOR 2's sake. . .and MINOR 1's
And can MINOR 1 orgasm while fucking and pull out so we can see the
cum?
And how much will it cost?

Chris: Yeah he want to
They will make a sex tape
Just two of them

JP: Ok. Please ask them who will film. They need a third person

Chris: I think for best results lets leave the two of them?
So no awkwardness?
Josh much better if its just 2 of them
So no words or talks
Thisnisgonna be so good
Im so excited

JP: Ok but the angle will be bad
I want to see it all
Their faces
From behind
Close up

Chris: Already made plans with agles
Cum shot will be like this
And a pov anal like this
And starts with full body sucking and fuckinh

JP: Amazing
And full body shots too
How much?

Chris: Yes
This is gonna be super hot
Bareback

400 josh

19. Excerpt from December 14, 2024:

Chris: *No message content to display.*⁴

Enjoy

I came so harf

Many times

MINOR 2 can take a fuckinh already

JP: Can't wait to watch!!

So hot

I want to see MINOR 2's face!!

I am willing to pay for another on if they find a third party to film or my preference is to include a young boy

Chris: Okay

Okau

If that will do thay will be veryyy hott

I love seeing MINOR 2 boy hole fuckrd

When can u transfer josh? Need it to pay them

JP: Will do tomorrow

I want to include a third young boy

But I don't think they used lube?

Chris: Josh

Josh

MINOR 1 film

Who u like to top MINOR 2

MINOR 3? Or MINOR 4?

MINOR 3 is the most recent boy they had

And MINOR 4, if you could remember ur original

I prefer MINOR 4

Big cock to fuck MINOR 2

JP: Hot but I want young boy

And I'm worried about MINOR 2

He deserves pleasure

I agree

Can they try to find young boy?

Like 11-12 yo?

⁴ Based on the rest of the conversation, I believe a media file was sent in this exchange, but the extraction was unsuccessful in obtaining this file.

Chris: Anal is pleasurable josh

JP: No pubic hair

Chris: I think hell like it

JP: MINOR 2 was not enjoying it I think

Chris: We turn him into an anal slut
Im afraid we cant find that josh sorry
Cause I realy don't wanna make a big mess josh
If theyre circle is small
All of this activity will be safe

JP: But I need you to promise me that if MINOR 2 doesn't like it, they don't do it. Also, where was the lube?

Chris: Sorry bout the lube
They didn't understand lube
But i went well

JP: I will not pay if they don't use it
I'm serious

[. . .]

Chris: Who u like to pair!

JP: MINOR 2 needs to cum

Chris: Okay
Both boy cums!

JP: MINOR 4

[. . .]

I wanna see all their faces as they are fucking
And ask them to shave their pubes if they can

[. . .]

Chris: I gave them detailed bulleted key points

1. Sucking
2. Good angles face showing and anal close up
3. Smooth
4. No lube no pay
5. Both should cum

Let me know if anything is missing

20. Excerpt from December 15, 2024:

Chris: [Attachment] *Click to play the video attachment.*⁵

Joshhhh soo hotttt

MINOR 2 is a bottom boi now

JP: Does MINOR 2 cum?
So 800?

Chris: Josh can u add 50 on the recent one. Have to add a little for the filmographer

JP: ok
by end of day

Chris: Thanks Josh
MINOR 2 ass is reall good
I wanna fuck him
And I wanna see you, fuck him
Thank u josh. U make me happy with the boy transactions makes me feel
better less lonely here

JP: Yea
He is hot
Loved seeing MINOR 4 again
I didn't see MINOR 2 cum though
They need to follow your directions better
It was so hot though

Chris: Soru josh
I really gave them clear bulleted instructions

JP: I know. I think MINOR 2 hates it
Anyway, it's done now
I want new kids
That's next

⁵ I reviewed the attachment Chris sent to DEWITTE in this exchange and confirmed that the content is child pornography. The video is approximately 2 minutes and 17 seconds in length. The video depicts two fully nude pubescent boys of Asian descent, who I believe are approximately 11 to 13 years old, based upon the overall size of their bodies, their childlike features, the size of their genitals, and lack of pubic hair. The boys are depicted having sexual intercourse with each other. One boy is standing up bent over while the other boy is standing behind him inserting his penis into the boy's anus. The camera angle changes numerous times to show a closeup of one boy penetrating the other boy. The genitals of both boys appeared to be completely shaved.

DEWITTE's Payments to TISOY

21. As shown above, DEWITTE promised on December 15, 2024, that he would issue payment for the child pornography video “by end of day.” Investigators found three PayPal accounts linked to DEWITTE. On December 15, 2024, at approximately 10:08:37 p.m. EST, one of these accounts issued a payment for \$810.47.

22. The payment was received by a PayPal account under the name “Christopher Allan Tisoy,” with an email address that includes TISOY’s first and last name (“the TISOY Email”), and country code “PH,” indicating that the owner of this PayPal account used an address in the Philippines to open the account. Between July 3, 2023, and December 27, 2024, DEWITTE’s three PayPal accounts issued a total of 87 payments to this Philippines account. The transaction amounts ranged from \$27.11 to \$958.36, for a total amount of approximately \$23,752.01.

23. TISOY is a citizen of the Philippines and is in the United States on an H-1B Visa. TISOY entered the United States on September 16, 2024, and was in the United States when the Telegram conversations between DEWITTE and “Chris” took place. TISOY is employed as a medical technologist at the Sinai Hospital of Baltimore in Baltimore, Maryland. In TISOY’s Form DS-160 (the online nonimmigrant visa application), and in TISOY’s rental application for his current residence in Baltimore, TISOY reported his full name as “Christopher Allan Jr Arac Tisoy” and the TISOY Email as his email address.

CONCLUSION

24. In summary, the foregoing paragraphs establish that DEWITTE and TISOY together produced videos depicting minors engaging in sexually explicit conduct. Specifically:

- a. Based on the conversation I observed between DEWITTE and TISOY, it appears that the two have a pre-existing relationship. For example, DEWITTE and TISOY

call each other by their first names, discuss particular individuals (MINOR 1, MINOR 2, MINOR 3, and MINOR 4) by name, and refer to prior sexual acts of MINOR 1 and MINOR 4.

b. In the conversation between DEWITTE and TISOY, the two negotiated the terms of the creation of a sexually explicit video involving minors. DEWITTE and TISOY negotiated, for example, which minors should be involved, which sex acts the minors should perform, who should film, including whether a third party or one of the minors themselves should film, what angles should be filmed, and how much DEWITTE should pay TISOY for the video. The negotiation incorporated the sexual preferences of both DEWITTE and TISOY, with the parties agreeing on what they would both find sexually gratifying.

c. After the negotiation, TISOY confirmed the terms of the agreement, asked DEWITTE for any further input, and told DEWITTE that he sent the minors “bulleted” instructions.

d. Within a day of the negotiation, TISOY transmitted a video depicting sexually explicit conduct involving minors to DEWITTE. The video involved minors located in the Philippines and TISOY transmitted it across state lines.

e. TISOY and DEWITTE’s discussion of the video reveals that the video was created to fulfill DEWITTE and TISOY’s agreement from the day before. For example, after DEWITTE received the video, his immediate response was to confirm the price he would pay for the video. Further, the minors DEWITTE and TISOY selected were in the video and MINOR 2 performed the sexual act DEWITTE and TISOY agreed he would perform. When DEWITTE noticed that, contrary to the agreement, one of the minors failed

to ejaculate, DEWITTE objected. In response to DEWITTE's objection, TISOY reiterated that he gave the minors "bulleted" instructions, just as he stated after DEWITTE and TISOY reached an agreement the day before. As PayPal documents confirm, later that day, DEWITTE paid TISOY in accordance with their agreement.

25. As such, I have probable cause to believe that from on or about December 13, 2024, through on or about December 15, 2024, Joshua DEWITTE and Christopher Allan TISOY employed, used, persuaded, induced, enticed, and coerced a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted and conspired to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18 United States Code, Sections 2251(a) and (e) and Section 2.

Respectfully submitted,



Brian A. Smith
Special Agent
Homeland Security Investigations

Sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 this 5th day of May, 2025.


HONORABLE JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE