

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Kyle Daniel Reese

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)
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Case No.

23-mj-7045

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 October 10, 2020 in the county of Camden in the
District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

18 USC 2252A(a)(5)(b) and (b)(2)

Possession of Child Pornography

See Attachment A

This criminal complaint is based on these facts:

See Attachment B

☒ Continued on the attached sheet.

Meagan Romanoski

Complainant's signature

SA Meagan Romanoski, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/21/2023

Elizabeth A. Pascal

Judge's signature

City and state:

Camden, New Jersey

Hon. Elizabeth A. Pascal, USMJ

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

Joseph McFarlane

By: _____
JOSEPH MCFARLANE
Assistant U.S. Attorney

Date: June 20, 2023

ATTACHMENT A

Possession of Child Pornography

On or about October 10, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

KYLE DANIEL REESE,

did knowingly possess and attempt to possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), depicting prepubescent minors who had not attained 12 years of age, which images had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which were produced using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer.

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

ATTACHMENT B

AFFIDAVIT

I, Meagan M. Romanoski, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since 2018. I have been assigned to the Philadelphia Division where I have been a member of the Child Exploitation and Human Trafficking Task Force, which investigates sex trafficking and child pornography, among other violations of federal law. I have received training from the FBI in the fields of human trafficking and the enforcement of federal child pornography laws.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. This Affidavit is being made in support of an arrest warrant for KYLE DANIEL REESE, for distribution, possession, and access with the intent to view child pornography or visual depictions of minors engaging in sexually explicit conduct, in violation of Title 18 United States Code § 2252A.

4. The statements in this Affidavit are based upon on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that KYLE DANIEL REESE committed violations of Title 18 U.S.C. § 2252A(a).

5. On August 10, 2015, KYLE DANIEL REESE pled guilty in the Western District of Louisiana of one count of Receiving Child Pornography, in violation of 18 U.S.C. § 2252(a)(2)(A). WDLA Docket No. 5:15-cr-110-SMH-MLH. On February 10, 2016, he was sentenced to 96 months of imprisonment, 60 months supervised release, \$100 special assessment and a \$2,000 fine. On September 28, 2020, REESE began serving a period of home detention at his home residence on Jaeger Court, Sicklerville, New Jersey. On June 28, 2021, REESE's term of supervised release began. As a condition of his supervised release, REESE was prohibited from possessing any material containing nudity or depictions of sexual activities or depicts sexually arousing materials. He was also prohibited from receiving or transmitting "any sexually arousing material, including child pornography."

6. On July 7, 2021, during an initial inspection of REESE's primary mobile device (an iPhone 12) by his United States Probation Officer, the Probation Officer observed several dozen sexually graphic images in violation of his conditions of supervision.

7. On August 24, 2021, during a subsequent routine inspection of REESE's mobile device, the Probation Officer saw additional sexually explicit material, as well as a virtual private network (VPN) and other mobile applications utilized to disguise data and Internet browsing activity. A review of the mobile device by the Probation Officer indicated that data was transferred from an unmonitored Internet-capable device.

8. On September 28, 2021, jurisdiction of REESE's supervised release was transferred to the District of New Jersey. Crim. No. 21-752 (RBK), DE 1.

9. On October 19, 2021, the Honorable Robert Kugler signed an order adding a condition of supervised release that required REESE to submit to searches of, among other things, his computers and devices. DE 3.

10. During a home visit conducted by the Probation Officer on October 21, 2021, REESE revealed he used two unmonitored devices that were currently in his mother's possession. REESE admitted that he used the devices to view child pornography. According to REESE, he accessed and viewed the child pornography prior to the commencement of his supervised release and while serving home detention with the Bureau of Prisons. Based on REESE's disclosure, the devices were seized by the Probation Officer for further investigation. Those devices were an iPad Mini, Serial Number DMPDW6X6LM93, and an iPhone 11, serial number C7CD3HZKN72J, IMEI 352904118360376.

11. REESE's Probation Officer had the devices extracted by Gloucester County Prosecutors Office. The Probation Officer then provided the extractions to your Affiant for review. Child pornography (also referred to as child sexual abuse material ("CSAM")), as defined in 18 U.S.C. § 2256, was found on the iPhone 11, serial number C7CD3HZKN72J. No CSAM was found on the iPad mini.

12. Your Affiant reviewed REESE's iPhone 11, Serial C7CD3HZKN72J (herein referred to as "the device") and found that REESE had visited TOR.com. Tor is a distributed network of computers run by volunteers from around the world. Users of Tor can use a Tor browser that conceals the IP address used to access the internet and also allows users to access websites that are otherwise not accessible from the internet. The IP address of these hidden services is replaced by a 16-character string, followed by ".onion" One of the applications installed on the device was the Onion/Tor Browser.

13. My review of the device also found identifiers associated with REESE, including his name, phone number, address, email accounts, and photos of REESE. For example, the device contained a photo of REESE's social security card and a photo of a Visa debit card with a

photo of REESE and the name Kyle Reese, both taken on November 4, 2020. Data for the photographs showed that the photos were taken at Latitude 39° 45' 41 N and Longitude 74° 1' 58 W, which is the approximate area of where REESE was residing at that time. I also found photos of REESE that were taken on December 10, 2020 with the same GPS coordinates.

14. There were a total of 111,803 image and video files on the device. Your affiant has reviewed the image and video files. Approximately 86 files (72 images, 8 gifs) depict child pornography, including nude, prepubescent female children engaging in sexual activity to include oral sex, vaginal sex, or masturbation with adult males. Additional images also depicted minors, however they are in various states of undress and their genitals are not visible. Three of the files are described below:

a) **Corrected.gif** – GIF depicting a prepubescent girl with no pubic hair exposing her vagina. The file had a Last Accessed and Last Write date of October 10, 2020.

b) **Bigm6mdxgx4rmcn3.onion.jpg** – image file depicting a female toddler performing oral sex on an adult male. The file had a Last Accessed and Last Write date of October 11, 2020.

c) **86028B3C-6D15-4A85-B201-7C8F6DCA6E3E.01fb9ea293267a56c9d972b9f414956814bc3e59a5** – image file depicting a prepubescent girl with no pubic hair exposing her vagina and anus. The file had a Last Accessed and Last Write date of November 2, 2020.

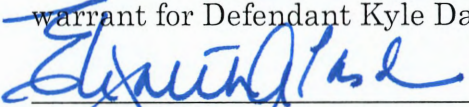
15. 28 of the CSAM files had the text bigm6mdxgx4rmcn3.onion visible on the image. Three images had the text litmindkhmd4inv4.onion visible on the image. These files all had a Last Accessed and Last Write date of October 11, 2020.

16. In a conversation via text message that began on November 7, 2020, REESE appeared to send instructions to someone he met at Kintock instructing him how to access the dark web (Kintock is a residential treatment facility that has contracts with the New Jersey Department of Corrections, NJ State Parole Board, and Federal Bureau of Prisons to provide services).

Meagan Romanoski

Meagan Romanoski
Special Agent, FBI

Pursuant to Fed. R. Crim. P. 4.1, Special Agent Romanoski was sworn and attested to the contents of this affidavit in support of the complaint and arrest warrant for Defendant Kyle Daniel Reese.



HON. ELIZABETH A. PASCAL
United States Magistrate Judge

Date: June 21, 2023