
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. José R. Almonte
: :
v. : Mag. No. 23-16117
: :
MICHAEL HAMILTON : CRIMINAL COMPLAINT

I, Charles Paddock, being duly sworn, state that 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 Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

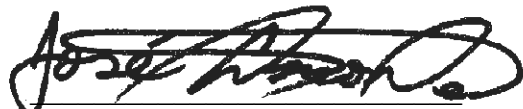
Continued on the attached pages and made a part hereof.

/s/ Charles Paddock

Charles Paddock, Special Agent
Federal Bureau of Investigations,
*Special Agent Charles Paddock
attested to this Complaint by
telephone pursuant to Fed. R. Crim.
P. 4.1(b)(2)(A).*

Sworn to before me and subscribed in my presence,
October 13, 2023, Essex County, New Jersey

Honorable José R. Almonte
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Sexual Exploitation of Children)

On a date in or before 2018, in Union County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL HAMILTON,

did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim-2, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having 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 commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO
(Receipt of Child Pornography)

From on or about February 4, 2023, to on or about July 26, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL HAMILTON,

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and, using any means and facility of interstate and foreign commerce, 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)(2)(A) and (b)(1).

COUNT THREE
(Possession of Child Pornography)

On or about October 13, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL HAMILTON,

did knowingly possess material that contained 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.

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

ATTACHMENT B

I, Charles Paddock, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. Accordingly, I have personal knowledge of the facts set forth below. Because this criminal Complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this Complaint are related in sum and substance and in part, and all dates and figures are approximate.

1. At all times relevant to this Complaint, defendant MICHAEL HAMILTON (“HAMILTON”) was a resident of Springfield, New Jersey, located in or around Union County, New Jersey.

2. In or around August 2023, law enforcement agents from the FBI learned that a seventeen-year-old (“Minor Victim-1”), living in a state outside New Jersey, had been communicating via an end-to-end online encrypted messaging platform (“Platform-1”) with a Platform-1 account purported to be controlled by an adult male living in New Jersey (the “Hamilton Platform-1 Account”).

3. A review of the contents of Minor Victim-1’s cell phone and a subsequent review of Platform-1’s return on a lawfully obtained search warrant of Minor Victim-1’s Platform-1 account and the Hamilton Platform-1 Account, revealed that from in or around February 2023 to in or around July 2023 revealed that Minor Victim-1 sent videos depicting child pornography to the Hamilton Platform-1 Account on numerous occasions. In sum, law enforcement identified approximately 207 saved messages sent from the Minor Victim-1 to the Hamilton Platform-1 Account during that period. These saved messages consisted of approximately 60 sexually explicit images and 128 sexually explicit videos, many of which constituted child pornography.

4. More specifically, and by way of example, the Hamilton Platform-1 Account received the following videos from Minor Victim-1 via Platform-1:

- a. On or about April 1, 2023, the Hamilton Platform-1 Account received a video of Minor Victim-1 masturbating using a sex toy, with Minor Victim-1’s buttocks, anus, vagina, and breasts visible.

- b. On or about May 13, 2023, the Hamilton Platform-1 Account received a video of Minor Victim-1 masturbating using a different sex toy than the one described above. Minor Victim-1's vagina is visible throughout the video.

5. A review of the same evidence further revealed that during the same period, the Hamilton Platform-1 Account sent Minor Victim-1 sexually explicit videos, photos, and messages.

6. More specifically, and by way of example, Minor Victim-1's phone contained the following messages from the Hamilton Platform-1 Account:

- a. On or about March 9, 2023, the Hamilton Platform-1 Account sent the Minor Victim-1 the following message: "Me too. I love your vids. You seem to enjoy mine. Imagine if we made vids together."
- b. On or about March 15, the Hamilton Platform-1 Account sent the Minor Victim-1 the following message: "So now you have to make sure you send to make me happy. Haha".

In keeping with the general pattern of Platform-1 communications between Minor Victim-1 and the Hamilton Platform-1 Account during this period, these messages were interspersed with sexually explicit images and videos constituting child pornography being sent between the two Platform-1 accounts.

7. A review of Minor Victim-1's Snapchat account revealed that on or about February 2, 2023, the day that Minor Victim-1 and the Hamilton Platform-1 Account became "friends" on Platform-1, Minor Victim-1's account display name included the number "17," which in Minor Victim-1's account display name for at least three weeks following the beginning of the Platform-1 contact between Minor Victim-1 and the Hamilton Platform-1 Account. Based on my training and experience, I believe that this display name clearly signaled to the user of the Hamilton Platform-1 Account that the user of Minor Victim-1's Platform-1 account was a minor.

8. Records obtained from Platform-1 revealed that the Hamilton Platform-1 Account repeatedly accessed Platform-1 from IP addresses assigned to a particular ISP ("ISP-1"). Records obtained from ISP-1 reveal that as of November 11, 2022—the earliest date the the Hamilton Platform-1 Account was accessed from a ISP-1 IP address and the day after HAMILTON created the Hamilton Platform-1 Account—that IP address was assigned to a Verizon customer account with a service address of HAMILTON's residence in Springfield, New Jersey (the "Hamilton Residence").

9. Based on the foregoing, on or about October 13, 2023, law enforcement executed a lawfully obtained search warrant at the Hamilton Residence. During the search, HAMILTON was present at the Hamilton Residence. After agreeing to a voluntary, post-*Miranda* interview with law enforcement, HAMILTON acknowledged:

- that he knew that Minor Victim-1 was 17 and that he had engaged in communications with Minor Victim-1 on Platform-1; and
- that he changed the display on the Hamilton Platform-1 Account to reflect the ages of the account holders whom he was communicating, including Minor Victim-1.

Law enforcement conducted an on-scene search of the Hamilton Platform-1 Account on HAMILTON's cell phone and confirmed that Minor Victim-1's display name included "17," among other identifiers.

10. During the search, HAMILTON further admitted that he previously met in person with a 16-year-old minor victim ("Minor Victim-2") in Roxbury, New Jersey. During that encounter, HAMILTON and Minor Victim-2 manually masturbated each other and recorded that sexual encounter. During the search of the Hamilton Premises, law enforcement identified a computer that HAMILTON admitted belonged to him. Law enforcement conducted an on-scene search of the computer and located the recording of the sexual encounter with Minor Victim-2 admitted to by HAMILTON. HAMILTON confirmed that the video that law enforcement located was the recording of that sexual encounter. The metadata of that video bore a date in 2018; HAMILTON claimed to law enforcement that the encounter had occurred approximately 10 years earlier.

11. During the search, law enforcement also identified an iPad that HAMILTON confirmed belonged to him. Law enforcement conducted an on-scene search of the iPad. During the search, law enforcement located one video of child pornography and two images of child pornography, including the following:

- a. The video, approximately 1 minute and 52 seconds in length, features an adult male penetrating a prepubescent female and close-up shots of the genitalia of the adult male and prepubescent female.
- b. The first image depicts a prepubescent female with her legs spread to expose her vagina to the camera.
- c. The second image depicts a prepubescent female performing oral sex on another prepubescent female.