
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
 :
 v. : Mag. No. 22-11275
 :
 SUNIL VAID : **CRIMINAL COMPLAINT**

I, Kelsey Granger, 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Kelsey Granger, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
October 18, 2022, at Newark, New Jersey.

HONORABLE ANDRÉ M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Production of Child Pornography)

From in or around February 2020 through on or about October 18, 2022,
in the District of New Jersey, and elsewhere, the defendant,

SUNIL VAID,

did knowingly use, persuade, induce, entice, and coerce minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Kelsey Granger, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, 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.

Investigation

1. The investigation revealed that VAID used multiple fraudulent online personas on a social media platform (the "Social Media Platform") and several email accounts to target female victims who are under the age of eighteen (the "Victims") and to solicit the Victims to take and then provide VAID with nude photos and videos of themselves. As outlined below, VAID interacted with the Victims on the Social Media Platform, then used an email account ("Account-1") to communicate with the Victims, using Persona-1, a male, to attempt, often successfully, to convince the Victims that he was both interested in a romantic relationship with them and could help them start their modeling careers by linking them with a second individual, Persona-2, a female. VAID then posed as Persona-2 and used another email account ("Account-2") to induce the Victims to send sexually explicit images and videos of themselves to VAID. As Persona-2, VAID also referred Victims to another email account that he controlled, posing as Persona-3, a male, and purported body expert and trainer who could help the Victims with their modeling careers. Examples of lawfully obtained communications between VAID and the Victims are outlined below.

Minor Victim-1

2. In or about March and April 2020, VAID posed as Persona-1 and Persona-2, and used Account-1 and Account-2 to communicate with a 13-year-old female victim ("Minor Victim-1"). In doing so, VAID persuaded Minor Victim-1 to send three images of her bare breasts, vagina and her face to Account-1.

Minor Victim-2

3. In or about May and June 2020, VAID posed as Persona-1 and Persona-2, and used Account-1 and Account-2 to communicate with another 13-year-old female victim ("Minor Victim-2") whom VAID met on the Social Media Platform. Over the course of that correspondence, VAID, posing as Persona-1 and using Account-1, repeatedly told Minor Victim-2 that he wanted to be her

“BF,” an acronym for “boyfriend[,]” and referred Minor Victim-2 to Persona-2 at Account-2 for assistance with Minor Victim-2’s modeling career.

4. Between on or about May 26, 2020 and on or about June 1, 2020, VAID posed as Persona-2 and used Account-2 to request that Minor Victim-2 send photos to begin the process of becoming a model. VAID instructed Minor Victim-2 to pose for these photographs as if Minor Victim-2 was seducing her “BF [Persona-1]” and to take the photographs in “diiferent [sic] sexiast seducing poses.” VAID also instructed Minor Victim-2 to conduct video calls with Persona-2 using Account-2, so that Persona-2 could take photographs of Minor Victim-2. Minor Victim-2 complied, agreeing to take part in video calls with Persona-2 and sending approximately 35 nude images to VAID at Account-2. VAID also asked Minor Victim-2 for contact information for two friends who would be interested in modeling.

Minor Victim-3

5. In or about March and April 2020, VAID posed as Persona-1 and Persona-2, using Account-1 and Account-2 to communicate with a 15-year-old female victim (“Minor Victim-3”). A review of lawfully obtained communications revealed that VAID, posing as Persona-1, met Minor Victim-3 on the Social Media Platform then communicated with Minor Victim-3 using Account-1. Using Account-1, VAID told Minor Victim-3 that he would meet her in person if the user of Account-2 (Persona-2) arranged a modeling contract for them together.

6. VAID then posed as Persona-2 and communicated with Minor Victim-3 using Account-2. VAID persuaded Minor Victim-3 to send nude photographs to Account-2 to begin the modeling process. Minor Victim-3 complied and sent approximately 81 nude or near nude photos to Account-2. VAID also directed Minor Victim-3 to provide names, email addresses and photos of her friends.

Minor Victim-4

7. On or about January 27, 2022, in another email account (“Account-3”), VAID received an email containing the subject line “pics,” from a 16-year-old female victim. The email contained 18 files, some of which appear to constitute child pornography, while the others appear to constitute child erotica. Specifically, one attached image depicts a nude pubescent minor female with long light brown hair and glasses in what appears to be a bedroom with blue walls (“Minor Victim-4”). In that image, Minor Victim-4 is sitting on a grey-hued carpet, leaning back on her hands with her legs spread, exposing her vagina to the camera.

Minor Victim-5

8. On or about March 7, 2022, Account-3 received an email containing the subject line "pics and VDO," from a 15-year-old minor female ("Minor-Victim-5"). The email contained 4 files, one which was child pornography, while the others were child erotica. The attachment that contained child pornography was a an approximately 3 minutes and 41 seconds long video that depicted Minor Victim-5 masturbating using a hairbrush.

9. On or about October 18, 2022, VAID admitted to law enforcement that he possessed, produced, and received child pornography, that he targeted minor females under the age of eighteen and that he was the sole user of each of the above referenced email accounts.

10. Based upon my education, training and experience, and my discussions with other law enforcement officers, I have probable cause to believe that the videos and images described above were transported and transmitted in interstate commerce, because they were transmitted or received by VAID over the Internet using an Internet-based application and email.