

ATTACHMENT A

From on or about January 9, 2017 through on or about January 27, 2019, in Gloucester County, in the District of New Jersey and elsewhere, defendant

MATTHEW ALONGI

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, or 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 2252A(b)(1) and Title 18, United States Code, Section 2.

## ATTACHMENT B

I, Kimberlee A. Gautier, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. 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.

1. At all times relevant to this Complaint, Defendant Matthew Alongi (“DEFENDANT ALONGI”) resided at 1791 Fourth Street, Thorofare, New Jersey (the “Thorofare Residence”).

2. In November 2018, an undercover agent for Homeland Security Investigations (the “UC”), began investigating individuals who were using the “Kik” social networking application to distribute child pornography. Specifically, the UC used an electronic device to connect to the internet and sign into an undercover Kik account, and he joined a Kik chat room called “#yungpeople14,” which bore the Kik public group title “10/14girls.” The Group Administrator of this chat room was an individual with a Kik user name “hey17898,” and a Kik display name “Chloe A.” Between November 16 and 21, 2018, “hey17898” distributed approximately 17 videos containing child pornography to the UC and other members of the chat room, by posting the videos to the Kik chat room. The UC downloaded each of the video files that “hey17898” distributed to the Kik chat room, and saved screen shots of the communication and distribution activity by “hey17898.”

3. I have reviewed the video and image files that “hey17898” distributed to the chat room between November 16 and 21, 2018, and I have determined that the files contain child pornography material. A sample is summarized and described below:

- a. **Video One- (IMG\_0018)** [approximately 36 seconds in duration, sent from “hey17898” to the Kik chat room on November 17, 2018]: This video depicts an adult male and a prepubescent female who is naked from the waist down. The prepubescent female appears to be approximately five years old. The video begins with the prepubescent female on her knees on a bed. The prepubescent female is performing fellatio on an adult male and her hands are on his penis while doing so. During the video the prepubescent female puts her hand up towards the video in a “stop” motion and makes a noise. The prepubescent female lays down on the bed at the end of the video on her back exposing her vagina while the male states, “so good so tight.”
- b. **Video Two- (IMG\_0023)** [approximately 16 seconds in duration, sent from “hey17898” to the Kik chat room on November 17, 2018]: This video depicts an adult male and a naked prepubescent female. The female is on her back while an adult male is in front of her and ejaculating into the prepubescent female’s mouth and on her face and body. The prepubescent female can be heard gagging and coughing.

4. On November 28, 2018, a subpoena was sent to Kik requesting subscriber information for “hey17898.” On December 3, 2018, Kik responded with the following subscriber information. First Name: Chloe, Last Name: A, Email: [mattlivesthephillies@yahoo.com](mailto:mattlivesthephillies@yahoo.com), Device Type: iPhone, Device Model: iPod touch, and IP Address: 73.215.110.149.

5. On December 31, 2018, a subpoena was sent to Comcast requesting subscriber information for IP address 73.215.110.149 during the dates and times that “hey17898” distributed the child pornography videos to the Kik chat group. On January 14, 2019, Comcast responded that the IP address during the pertinent dates and times was assigned to John Alongi at 1791 Fourth Street, Thorofare, New Jersey 08086.

6. The Thorofare IP Address was registered to John Alongi, who is the father of DEFENDANT ALONGI. My investigation, which has included a review of public source documents, physical surveillance, and interviews, revealed that DEFENDANT ALONGI resided

at the Thorofare Residence with his father, John Alongi, and his brother, Christopher Alongi, at all times relevant to this Complaint.

7. On May 8, 2019, I, along with other law enforcement agents, executed a federal search warrant at the Thorofare Residence. DEFENDANT ALONGI, John Alongi, Christopher Alongi, and Christopher Alongi's girlfriend, Kimberly Johnston, were all present at the time the search warrant was executed. Law enforcement agents informed all parties that the search warrant was being conducted in furtherance of a child pornography investigation. DEFENDANT ALONGI was agitated and he declined to speak to law enforcement agents. The electronic devices belonging to John Alongi, Christopher Alongi, and Kimberly Johnston, were reviewed on the scene and found to be free of child pornography, and each was returned to its respective owner. Several other electronic devices were seized from the living room of the Residence, including an iPod Touch 5<sup>th</sup> generation bearing serial number CCQNN5T0FMJG, an iPod Touch 6<sup>th</sup> generation bearing serial number CCQVM2SZGM1C, an iPhone 6s bearing serial number FFNT5FTMHFLR, and an iPhone 8 bearing serial number FFMYY10KMJC6C. John Alongi, Christopher Alongi, and Kimberly Johnston each denied ownership of these devices, and they were all subjected to a full forensic analysis.

8. A forensic analysis of the iPod Touch 5<sup>th</sup> generation bearing serial number CCQNN5T0FMJG reflected that user of the iPod Touch 5<sup>th</sup> generation, using the display name "Molly [three smiley face emojis wearing sunglasses]," distributed images containing child pornography to others. I reviewed the videos and images found on the device and a sample is summarized and described below:

- a. **Image One- (fd9d1d49-e841-4ef1-88e2-fa2bbd92124c)** [sent from "Molly [three smiley face emojis wearing sunglasses]" to an individual using the display name "amandawells99" on January 9, 2017]: This image depicts what appears to be a prepubescent female. The prepubescent female is naked from the waist down and

laying on her back. The image is focused on the prepubescent female's vagina. The prepubescent female is being vaginally penetrated by an adult male's penis.

- b. **Image Two- (0a43aac8-56b4-44c2-a1d2-682d38269b9c)** [sent from “Molly [three smiley face emojis wearing sunglasses]” to an individual using the display name “citlaly [one smiley face emoji]” on April 16, 2017]: This image depicts what appears to be a prepubescent female. The prepubescent female is naked from the waist down. The image is focused on the prepubescent female's vagina. The prepubescent female is being vaginally penetrated by an adult male's penis.

I also located a Kik chat thread on this device between “Molly [three smiley face emojis wearing sunglasses]” and an individual using the display name “Emily S.” On March 6, 2017, “Molly [three smiley face emojis wearing sunglasses]” told “Emily S,” “You know my real name is Matt we talked before around Christmas lol.”

9. A forensic analysis of the iPod Touch 6<sup>th</sup> generation bearing serial number CCQVM2SZGM1C reflected that the user of the iPod Touch 6<sup>th</sup> generation, using the display name “Chloe A,” distributed images containing child pornography to others. I reviewed the videos and images found on the device, and a sample is summarized and described below:

- a. **Image One- (eba2ac73-a143-4c3e-b65f-db43339ec085)** [sent from “Chloe A” to an individual using the display name “Dan Reed” on January 27, 2019]: This image depicts a prepubescent female naked from the waist down. The image is focused on the prepubescent female's vagina. The prepubescent female is holding her vagina open with both hands.
- b. **Image Two- (43b2f33d-ef3d-47b2-976e-7ad11fa0fd45):** [sent from “Chloe A” to “Dan Reed” on January 27, 2019]: This image depicts a prepubescent female naked. The prepubescent female is on her back with her legs spread open. The images is focused on the prepubescent female's vagina. The prepubescent female is being vaginally penetrated by an adult male's penis. The prepubescent female's finger is also touching her vagina.

I also located a Kik chat thread on this device between “Chloe A” and “Dan Reed” that began on or about January 24, 2019 and ended on or about April 1, 2019. The first message sent by “Chloe A” to “Dan Reed” said, “Send young girls getting fucked videos.” Thereafter, “Dan Reed” sent videos and images containing pornography to “Chloe A,” and “Chloe A” responded to some of

them by stating, “To old,” “Under 13,” and “Send young girls getting fucked underage or bye.” The forensic analysis additionally revealed that the Apple ID associated with this device was malongi1989@yahoo.com.

10. Further forensic analysis was conducted by comparing the seventeen (17) child pornography videos that “hey17898” distributed to the Kik chat room from the Thorofare IP Address between November 16 and 21, 2018, with child pornography videos that were found on the iPod Touch 6<sup>th</sup> generation bearing serial number CCQVM2SZGM1C. The analysis revealed that at least six (6) of the child pornography videos that “hey17898” distributed to the Kik chat room matched child pornography videos that were found on the iPod Touch 6<sup>th</sup> generation. I have personally reviewed each of the child pornography videos that were distributed to the Kik chat room and that were found on the iPod Touch 6<sup>th</sup> generation, and a sample is summarized and described below:

a. **Video One- (IMG\_0274.mp4)** [approximately 1 minute and 14 seconds in duration, sent from “hey17898” to the Kik chat room on November 17, 2018]: This video depicts an adult male and a naked prepubescent female. The video begins with the prepubescent female on her knees on a bed. The adult male directs the prepubescent female to put her forehead on the pillow. The adult male grabs the prepubescent female’s hips and inserts his penis into her anus. The adult male wraps his hand around the prepubescent female’s hip and places it in the area of her vagina. The video then shows the prepubescent female lying on her back with the adult male’s penis in her mouth. The adult male then grabs the prepubescent female’s hand and places it on his penis and makes her masturbate the adult male’s penis. The adult male taps the prepubescent female’s forehead several times during the video to force her to look up at him.

b. **Video Three- (IMG\_0280.mp4)** – [approximately 1 minute and 59 seconds in duration, sent from “hey17898” to the Kik chat room on November 17, 2018]: This video depicts an adult male and a naked prepubescent female. The video begins with the prepubescent female on her knees face down on what appears to be a pull-out couch. The adult male is on his knee behind the prepubescent female and he inserts his penis into the prepubescent female. The adult male then kisses the female on her lower back. The video ends with the prepubescent female posing naked while it appears that someone is taking photos, because a flash can be seen.

11. A full forensic examination was also conducted on the iPhone 6s bearing serial number FFNT5FTMHFLR, the iPhone 8 bearing serial number FFMY10KMJC6C, and the iPod Touch 5<sup>th</sup> generation bearing serial number CCQNN5T0FMJG. This examination revealed that the above items contained over six hundred (600) images and over one hundred fifty (150) videos of child pornography.

12. Based on my education, training and experience, and my discussion with other law enforcement officers, and to the best of my knowledge, the videos and images described above were distributed, received and possessed using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the videos and images were uploaded to, and downloaded from, the Internet, based upon, among other things, the videos that were distributed from the Thorofare IP Address to the UC and others in the Kik chat group and that were found on the iPod Touch 5<sup>th</sup> generation bearing serial number CCQNN5T0FMJG and the iPod Touch 6<sup>th</sup> generation bearing serial number CCQVM2SZGM1C.

13. In light of the information learned by me in the course of this investigation, including the fact that an individual distributed child pornography videos to an undercover agent in a Kik chat room using an IP address that was assigned to DEFENDANT ALONGI'S father at the THOROFARE RESIDENCE; that DEFENDANT ALONGI lived at the THORFARE RESIDENCE during the dates and times that the videos were distributed to the undercover agent; that a search warrant was executed at the THOROFARE RESIDENCE, and all of the devices owned by DEFENDANT ALONGI'S father, brother, and brother's girlfriend were searched and found to be free of child pornography; that several devices were seized from the living room of the THOROFARE RESIDENCE and child pornography images and/or videos were distributed

from those devices; that DEFENDANT ALONGI's father, brother, and brother's girlfriend all denied ownership of the devices that contained child pornography; that the user of one of the devices from which child pornography was distributed said in a Kik chat thread, "You know my real name is Matt..."; that the user of one of the devices from which child pornography was distributed was associated with Apple ID [malongi1989@yahoo.com](mailto:malongi1989@yahoo.com); and that at least six of the child pornography videos that were distributed to the undercover agent in the Kik chat room matched child pornography videos that were found on a device that was seized from the living room of the THOROFARE RESIDENCE; probable cause exists to believe that the crime of distribution of child pornography has been committed, and that DEFENDANT ALONGI is the person who committed that crime.