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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Edward S. Kiel, U.S.M.J.  
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 v. : Mag. No. 20-15486  
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 ANTONIO DEL PRADO : **CRIMINAL COMPLAINT**  
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 :

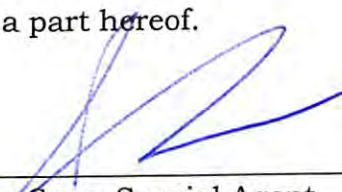
I, Isidro Cruz, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Department of Homeland Security – Homeland Security Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

  
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Isidro Cruz, Special Agent  
U.S. Department of Homeland Security

Special Agent Cruz attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

November 10, 2020  
Date

at

Essex County, New Jersey  
County and State

Honorable Edward S. Kiel  
United States Magistrate Judge  
Name and Title of Judicial Officer

Edward S. Kiel/ke  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
**(Production of Child Pornography)**

On or about August 5, 2019, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

ANTONIO DEL PRADO,

did knowingly use, persuade, induce, entice, or coerce any minor 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 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.

**COUNT TWO**  
**(Possession of Child Pornography)**

On or about October 7, 2020, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

ANTONIO DEL PRADO,

did knowingly possess material that contained at least three images of 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) and 2.

**COUNT THREE**  
**(Possession of Child Pornography)**

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

ANTONIO DEL PRADO,

did knowingly possess material that contained at least three images of 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) and 2.

## **ATTACHMENT B**

I, Isidro Cruz, am a Special Agent with the United States Department of Homeland Security – Homeland Security Investigations. 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.

### **Background**

1. At all times relevant to this Complaint, defendant Antonio Del Prado ("DEL PRADO") was a resident of Millburn, New Jersey.

### **The Investigation**

2. In or around October 2020, law enforcement received information indicating that an individual with username "tonydelprado" had uploaded multiple images and videos depicting child pornography to an internet service/cloud-based storage provider ("ISP-1"). According to ISP-1, "tonydelprado" had uploaded approximately 56 images and 18 videos of suspected child pornography on or about October 7, 2020. Descriptions of three of these videos are as follows:

- a. **e8e41e9404c91dc55c9f80586480e1f8-Untitled13.mp4**: This video depicts what appears to be an unclothed prepubescent female putting her mouth on the chest and vagina of a toddler-aged female child. The video is approximately 1 minute and 4 seconds in length.
- b. **f728b9c6c7584cf7fbd7c91a8a85d6be-Untitled12.mp4**: This video depicts what appears to be an unclothed 7-year-old female child performing oral sex on an adult male, while he touches the vagina of an additional unclothed prepubescent female child. This video is approximately 1 minute and 4 seconds in length.
- c. **506e1c139ce1693109f12663c6a16c86-Untitled3.mp4**: This video depicts what appears to be a clothed adult female putting her finger and mouth on an unclothed toddler-aged female child in the presence a prepubescent female child who is only

wearing underwear. This video is approximately 1 minute and 5 seconds in length.

3. Shortly thereafter, law enforcement received additional information indicating that "tonydelprado" had uploaded an additional video of suspected child pornography to ISP-1. This video, which was entitled "a9d18714fb54792392e3c2c131d8349b-Screen Recording (8-5-2019 9-55-16 PM).wmv" (the "Screen Recording Video"), appears to be a screen recording from a desktop computer of a video messaging session. It shows an adult female ("Adult Female-1") sexually assaulting a prepubescent male child, who appears to be approximately eight to ten years old ("Minor Victim-1"). The video is approximately twenty minutes long. During the video, a male, subsequently identified as DEL PRADO, appears in a video chat box and can be heard communicating with Adult Female-1. Notably, DEL PRADO is wearing a distinct lime green t-shirt. A law enforcement translation indicates that DEL PRADO was instructing Adult Female-1 to commit multiple acts of sexual assault against Minor Victim-1, including fellatio and vaginal penetration. Based on my law training and experience, I am aware that computer systems frequently default to the date and time at which a file was created. As such, I believe that DEL PRADO created the Screen Recording Video on or about August 5, 2019.

4. According to ISP-1, all of the videos referenced above were uploaded to ISP-1 from Internet Protocol address 100.1.2.191 ("Subject IP-1"), which resolves to Antonio Del Prado's residence in Millburn, New Jersey ("Del Prado's Residence").

5. Based on the foregoing, on or about November 10, 2020, law enforcement executed a search warrant at Del Prado's Residence. During the search, law enforcement identified the computer workstation from which DEL PRADO created the Screen Recording Video. The workstation was equipped with three monitors, one of which had a web-camera. Notably, the room seen in the background of the Screen Recording Video is virtually identical to the background law enforcement physically observed from the workstation.

6. Law enforcement conducted an on-scene search the computer located at DEL PRADO's workstation. During the search, law enforcement located the Screen Recording Video. Law enforcement also located over ten additional videos of child pornography, including the following:<sup>1</sup>

- a. The first video is approximately 14 minutes and 23 seconds in length. The video features an adult female performing oral sex on a prepubescent male child who appears to be approximately

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<sup>1</sup> The preliminary examination revealed the content of the videos and the file-path, but did not capture the full file names.

9 to 10 years old. The video also depicts the male child performing oral sex on the adult female.

- b. The second video is approximately 10 minutes and 30 seconds in length. The video shows an adult female performing oral sex on a prepubescent male child who appears to be 9 to 10 years old.
- c. The third video is 6 minutes and 33 seconds in length. The video shows an adult female performing oral sex on a prepubescent male child who appears approximately 9 to 10 years old.

7. Law enforcement also located the lime green shirt that DEL PRADO wore while creating the Screen Recording Video.

8. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the videos described above were transported and transmitted in interstate commerce because they were transmitted by DEL PRADO via an Internet-based application, at which time they were stored on servers located outside the District of New Jersey.