
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

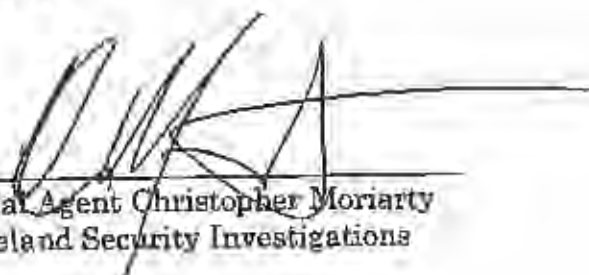
UNITED STATES OF AMERICA : Hon. André M. Espinosa
 :
 v. : Mag. No. 22-11073
 :
 EZRA W. SAPHIRE : CRIMINAL COMPLAINT

I, Christopher Moriarty, the undersigned complainant 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 Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B



Special Agent Christopher Moriarty
Homeland Security Investigations

Sworn to before me by telephone pursuant
to F.R.C.P. 4.1(B)(2)(A), on March 9, 2022

THE HONORABLE ANDRÉ ESPINOSA
UNITED STATES MAGISTRATE JUDGE

S/ André M. Espinosa
Signature of Judicial Officer

3-9-2022

ATTACHMENT A
(Distribution of Child Pornography)

From on or about June 2021 through or about March 8, 2022, in Essex County, in the District of New Jersey and elsewhere, defendant

EZRA W. SAPHIRE,

did knowingly distribute material containing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Section 2.

ATTACHMENT B

I, Christopher Moriarty, am a Special Agent with Department of Homeland Security, Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. All included statements are related in substance and in part. All dates and times are approximations.

1. At all times relevant to this Complaint, defendant EZRA W. SAPHIRE, was a resident of West Orange, New Jersey, and was a food services contractor at a high school in East Hanover, New Jersey.

2. From on or about June 9, 2021 through on or about January 23, 2022, law enforcement conducted undercover online sessions using a publicly-available peer-to-peer ("P2P") software application program (the "Sessions"). P2P is a method of communication available to Internet users through the use of special software (the "P2P Program"). The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together.

3. Generally, when P2P software is installed on a computer, the user is directed to specify a "shared" folder. All files placed in that user's "shared" folder are available to anyone on the worldwide network for download. A person interested in sharing child pornography with others in the P2P network need only place those files in his or her "shared" folders. Those child pornography files are then available to all users of the P2P network for download regardless of their physical location. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce.

4. The P2P software allowed users to connect to and share, search, and download content. The version used by law enforcement allows it to determine the IP address through which target computers access the Internet.

5. During the Sessions, a computer user (the "Computer") shared multiple files of child pornography using the P2P Program. Law enforcement established a direct connection to the Computer. Several of the files being shared by the Computer had hash values that were identified to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the Sessions by the Computer using a particular IP Address (the "IP Address"). Video files and images of child pornography were available from the IP Address, which other users accessing the P2P Network could download.

6. During the Sessions, law enforcement downloaded approximately 1,014 video files and 659 image files containing child pornography through the IP address.

7. The video and image files downloaded via the IP address included multiple visual depictions of pre-pubescent children engaged in sexual acts with adults or an animal and as such contain child pornography. The following are representative samples:

FILENAME	DESCRIPTION
<p>File Name/Number: Linda 10yo fucks the pedo man.avi</p> <p>Hash Value: 862fe99a28ef9a4fd6 634b6e66ca3fde</p>	<p>This video, which is approximately 1 minute and 43 seconds in length, depicts an adult male lying on his back on a bed with blue sheets. The adult male, who is wearing nothing but socks, thus exposing his erect penis, is visible from his chest, which is in the foreground, to his feet. At the outset of the video clip, a prepubescent girl, who appears to be approximately 8-10 years in age, gets on top of the male's penis while facing away from the camera. She is entirely nude with the exception of a dark colored ski mask which covers her head. Her medium brown hair extends down from underneath the ski mask to the middle of her back. As the video proceeds, the adult male vaginally penetrates the prepubescent female. In the next segment, the prepubescent female reverses her position such that she is facing toward the camera while straddling the adult male albeit with only the back and bottom of the ski mask within the camera frame. The adult male continues to vaginally penetrate the prepubescent female through the end of the video clip. This video file was downloaded by law enforcement during a session lasting between 10:08 PM on June 10, 2021 and 6:09 PM on June 11, 2021.</p>
FILENAME	DESCRIPTION
<p>File Name/Number: PTHC – sucknew 7yo swallows daddy's load (1 min 6 sec)</p> <p>Hash Value: 5c71dac215232087 842e3ce30a85d3ec</p>	<p>This video, which is approximately 1 minute and six seconds in length, depicts a prepubescent girl who is visible in profile from just below her shoulders to the top of her head. The girl has medium, straight blond hair that extends just below her bare shoulders. A white wall is visible in the background. The girl, who appears to be from 4 to 7 years in age, is apparently on her knees as she holds an erect penis with her right hand. The adult male, who is standing in profile to the right of the screen, is visible from his upper thighs to his lower stomach. As the video progresses, she performs fellatio upon the adult male. During a second segment of the video clip, he is depicted holding his penis in his right hand as he ejaculates into the girl's mouth while pulling back the hair on the back of her head with his left hand. This portion of the video is repeated in a loop and is presented in slow motion. The video concludes with the girl kissing the erect penis post-ejaculation. This video file was downloaded by law</p>

	enforcement during a session which took place between approximately 11:39 PM on June 9, 2021 and approximately 4:50 AM on June 10, 2021.
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8. Based upon my education, training, and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the files described in paragraph 7 above traveled in interstate commerce, via the Internet.

9. The IP Address was assigned, at the approximate times of the Sessions, to an account registered to SAPHIRE's residence.

10. On or about March 8, 2022, law enforcement executed a search warrant at SAPHIRE's residence. During the search of the residence, law enforcement seized, among other things, a Dell OptiPlex 390 tower computer from SAPHIRE's bedroom. P2P software was installed on this computer. A preliminary examination of that Dell OptiPlex 390 tower computer revealed a folder named "pedo," which contained approximately 1,850 image files. A preliminary review of certain image files in the "pedo" folder revealed images believed to be child pornography, including multiple images of what appears to be adult male penises vaginally penetrating prepubescent children.

11. SAPHIRE voluntarily agreed to an interview with law enforcement during which he admitted to, among other things, possessing the Dell OptiPlex 390 tower computer found in his bedroom; using P2P software to download and share child pornography, including during June and July 2021; and that he knew possessing and downloading child pornography was illegal.