

Approved: _____

SHAUN E. WERBELOW

Assistant United States Attorney

Before: THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :
 : COMPLAINT 23mj 6266
 :
-v.- : Violation of 18 U.S.C. §
 : 2422(b)
JOHN LORD, :
 : COUNTY OF OFFENSE:
Defendant. : WESTCHESTER
 :
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SOUTHERN DISTRICT OF NEW YORK, ss.:

ERICA BUONOCORE, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigations, and charges as follows:

COUNT ONE
(Enticement of a Minor)

1. On or about August 30, 2023, in the Southern District of New York and elsewhere, JOHN LORD, the defendant, knowingly, using facilities and means of interstate and foreign commerce, persuaded, induced, enticed and coerced an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, to wit, LORD, in electronic communications, persuaded, induced, enticed and coerced a 15-year-old minor ("Victim-1") to engage in sexual activity with LORD in WESTCHESTER County, New York.

(Title 18, United States Code, Sections 2422(b))

The bases for my knowledge and the foregoing charges are, in part, as follows:

2. I am a Special Agent with the Federal Bureau of Investigations ("FBI"), assigned to the Westchester County Safe Streets Task Force. I have participated in numerous

investigations involving crimes against children, including the receipt, possession, and/or distribution of child pornography by electronic means, sexual exploitation, and enticement of minors. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

3. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement officers and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. On August 30, 2023, at approximately 3:30 p.m., the mother of a 15-year-old boy ("Victim-1") reported in-person to the Bedford Police Department that she believed an adult male, later identified as JOHN LORD, the defendant, had engaged in sexual activity with Victim-1 in Westchester County, New York.

5. Based on my conversations with an officer of the Bedford Police Department ("Officer-1") and my review of a recorded interview, I am aware that the mother of Victim-1 provided the following information, in substance and in part:

a. On August 30, 2023, at approximately between 2:30 p.m. and 3:00 p.m., the mother of Victim-1 went looking for her 15-year-old son and discovered JOHN LORD, the defendant, with Victim-1 in a wooded area in Katonah, New York. She recorded the encounter on video using her cellphone.¹

b. When the mother of Victim-1 arrived, LORD was naked from the waist down (wearing only socks), with his penis exposed. Victim-1 was in his underwear.

c. As the mother of Victim-1 approached LORD and Victim-1, LORD grabbed his underwear and fled. The mother of

¹ I have reviewed the video, which is consistent with the facts reported by the mother of Victim-1 and described herein.

Victim-1 attempted to follow LORD and captured on video the license plate of a nearby parked vehicle.²

d. Following the incident, Victim-1 told his mother that Victim-1 had initially met LORD on an online application.

e. At approximately 3:30 p.m., the mother of Victim-1 traveled to the Bedford Police Department with Victim-1 and reported the incident.

6. Based on my conversations with Officer-1 and review of a videotaped interview, I am aware that Victim-1 told Bedford Police that he had met an older man named "John" on an online application within the last month and that they communicated on that application, on Snapchat, and via messages; that Victim-1 met "John" in-person on August 30, 2023; that on that date, "John" had touched Victim-1's penis and performed oral sex on Victim-1; that Victim-1 had met "John" at least three times previously and that on those prior occasions they did the "same things." Victim-1 also told Bedford Police that "John" was saved in Victim-1's phone as "BB" with picture of a "hot pepper."

7. While at the Bedford Police Department on August 30, 2023, Victim-1's family provided Bedford Police with Victim-1's phone ("Phone-1") and authorized law enforcement to conduct a search of Phone-1.

8. I have reviewed messages on Phone-1 between Victim-1 and a contact saved as "BB" with a picture of a pepper, which include the following:

a. On August 30, 2023 at approximately 10:39 a.m., "BB" wrote, "Get your brother busy doing something so we can see each other." Victim-1 replied, "I asked him if he was going to his friends he said idk." "BB" replied, "Well maybe we will get lucky." Victim-1 responded, "Maybe."

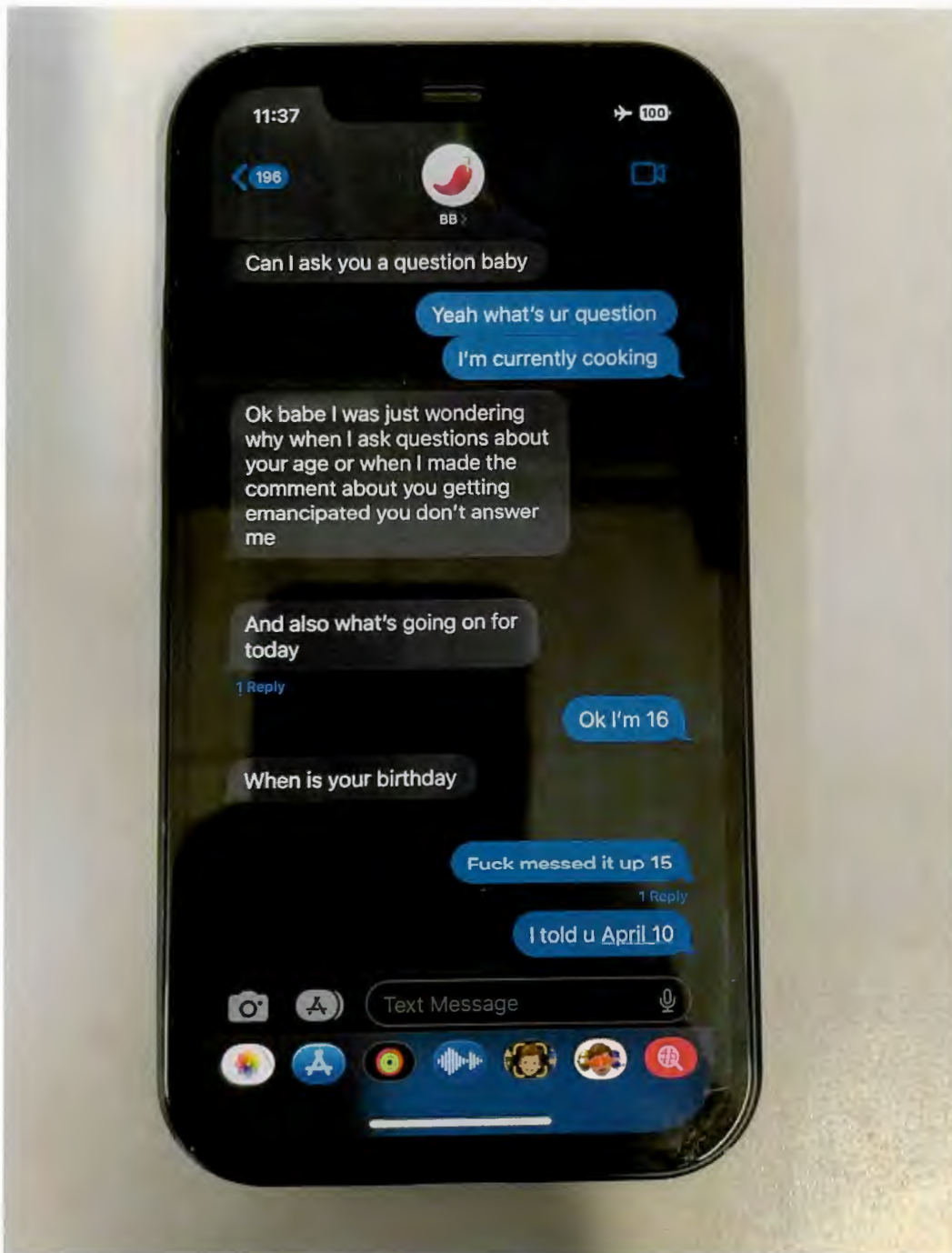
b. At approximately 10:42 a.m., "BB" added, "Hopefully bc I want to pound your hole." Victim-1 replied, "I mean Im up," to which "BB" replied, "I'd be down deep."

² A records search conducted by law enforcement indicated that the vehicle is registered to the brother of JOHN LORD, the defendant, with whom LORD is currently residing.

c. At approximately 10:44 a.m., "BB" wrote, "I'm gonna cum so much it's gonna squirt out of your mouth."

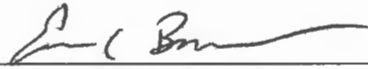


d. The day prior, on August 29, 2023, at approximately 2:24 p.m., "BB" asked Victim-1 about his age and Victim-1 told "BB" that he was 15 years old.




9. On August 30, 2023 at approximately 7:30 p.m., JOHN LORD, the defendant, was arrested by the Putnam County Sheriff's Office. LORD, who is 40-years-old, told law enforcement that he had met Victim-1 on an online application; he thought Victim-1 was of age; he had been with Victim-1 on August 30, 2023 and they had been "kissing and jerking each other off"; and they had done the same thing on prior occasions.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of JOHN LORD, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



Erica Buonocore
Special Agent
Federal Bureau of Investigations

Sworn to before me this
31st day of August, 2023



THE HONORABLE ANDREW E. KRAUSE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK