

UNITED STATES OF AMERICA

v.

SAMUEL GONZALEZ,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§
2252A(a)(5)(B), (a)(2)(B), (b)(1),
(b)(2), and 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

25 MAG 1376

MATTHEW DERAGON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Distribution of Child Pornography)

1. From at least in or about January 2023 through at least in or about April 2023, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ, the defendant, knowingly received and distributed material that contained child pornography using a 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, to wit, GONZALEZ distributed files containing images of child pornography, including sexually explicit images and videos of prepubescent minors and minors who had not attained 12 years of age, on messaging applications and a cloud storage service, among other means, while in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(2)(B), (b)(1), and 2.)

COUNT TWO

(Possession of Child Pornography)

2. From at least in or about January 2023 through at least in or about June 2023, in the Southern District of New York and elsewhere, SAMUEL GONZALEZ, the defendant, knowingly possessed and accessed with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, GONZALEZ possessed child pornography, including sexually explicit images and videos of prepubescent minors and minors who had not attained 12 years of age, on his cellphone, tablet, and laptop, in his residence in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2.)

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

3. I have been a Special Agent with the FBI for approximately ten years. I am assigned to an FBI squad charged with enforcing federal laws prohibiting child pornography and other forms of child exploitation. As such, I have worked on numerous investigations and prosecutions involving adults who possess and distribute child pornography. This affidavit is based upon my personal participation in the investigation of this matter, as well as on my conversations with other law enforcement officers and my examination of documents, reports, and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Offense Conduct

4. Beginning in or about January 2023, while operating as an FBI undercover agent, I used an alias (the "UC Alias") on a particular messaging application ("Application-1"). Based on my involvement in the investigation, including my conversations with other law enforcement officers and my undercover communications on Application-1, using the UC Alias, I learned the following, in substance and in part:

a. In or about January 2023, a user of Application-1 ("User-1") contacted the UC Alias. User-1, whose username included the name "sammy," was subsequently identified as SAMUEL GONZALEZ, the defendant, as described further below. *See infra* ¶ 8.

b. The profile of User-1 on Application-1 described User-1 as a "performer" who was 29 years old and included several full body and face photographs of User-1.

c. User-1 sent the UC Alias a message and symbols on Application-1, including a devil emoji followed by two slashes, that, based on my training and experience, meant that User-1 was interested in having a sexually taboo conversation. In response, as the UC Alias, I informed User-1 that I preferred to communicate on a different messaging application ("Application-2"). User-1 provided the UC Alias with User-1's account username on Application-2, which listed User-1's account nickname as "S G."

5. Based on my involvement in the investigation, including my conversations with other law enforcement officers and my communications on Application-2 as the UC Alias in an undercover capacity, I learned the following, in substance and in part:

a. On or about January 12, 2023, on Application-2, after the UC Alias asked User-1 what User-1 was interested in, User-1 replied "dad/son and young boys." Based on my training and experience, I understood that response to mean that User-1 is interested in the sexual exploitation of children.

b. On or about January 16, 2023, User-1 told the UC Alias on Application-2 that User-1 had a collection of child pornography videos and his favorite video was of a six- or seven-year-old "little blonde boy getting spit roasted by two hot and hung pervs." Based on my training and experience, I understood User-1 to be referring to a video involving a minor engaging

in sexually explicit conduct with adults. On or about January 16, 2023, User-1 also sent the UC Alias a photograph of User-1 similar to the photographs of User-1's profile pictures on Application-1.

c. On or about January 16, 2023, User-1 told the UC Alias over text message on Application-2 that User-1 lived in a particular neighborhood in Manhattan, and User-1 told the UC Alias over text message on Application-2 that User-1 was house sitting in the East Village neighborhood of Manhattan and would be there for the next two weeks.

d. On or about January 17, 2023, User-1 sent the UC Alias two links that contained approximately 1500 files of child pornography that depicted boys and girls between the ages of approximately two and 16 years old engaged in sexual activity with themselves, other children, and adults. User-1 admitted to storing additional child pornography files on a flash drive. Shortly after User-1 sent the link to the UC alias, User-1 sent the UC Alias a message on Application-1 that User-1 was in the East Village.

e. On or about January 18, 2023, User-1 sent the UC Alias one link that contained approximately 550 files of child pornography that depicted male children between the ages of approximately four and 16 years old engaged in sexual activity with themselves, other children, and adults.

f. On or about April 3, 2023, User-1 sent the UC Alias one link that contained approximately 749 files of child pornography that depicted male children between the ages of approximately four and 16 years old engaged in sexual activity with themselves, other children, and adults.

6. Based on my involvement in the investigation, including conversations with other law enforcement officers and review of records and report, I have learned that, in or about June 2023, pursuant to a judicially-authorized search warrant, the FBI seized and searched approximately seven electronic devices, including an Apple iPhone (the "Gonzalez iPhone"), an Apple laptop (the "Gonzalez Laptop"), an Apple iPad mini (the "Gonzalez iPad"), two 16 gigabyte thumb drives, a USB drive, and a My Passport HD drive (the "Gonzalez Devices"), from the residence of SAMUEL GONZALEZ, the defendant. As a result of the searches and seizures of some of those devices, I have learned the following, in substance and in part:

a. An initial forensic review of the Gonzalez iPhone and Gonzalez Laptop identified approximately 87 visually unique files of child pornography consisting of approximately 18 videos and 69 images. The files included images and videos depicting children, who appear to be as young as a few months old up to teenage years, engaged in sexual activity with other children and adults.

b. Among the files on the Gonzalez iPhone and Gonzalez Laptop were the following:

i. A video, approximately two minutes and 11 seconds long, depicting a child, who appears to be approximately one year old, sitting on a bed wearing a diaper and a t-shirt. An adult male kneels on the bed in front of the child. The adult male dips his penis into a cup containing what appears to be pudding. The adult male then places his penis in front of the

child, who licks the substance off of the adult male's penis. The adult male does this repeatedly. The child attempts to crawl away but is held back by the adult male who re-engages the child with the same act.

ii. A video, approximately 51 seconds long, depicting a child, who appears to be approximately two years old, sitting on a bed with an adult male who is nude from the waist down. The adult male holds the back of the child's head repeatedly pushing the child mouth down onto the adult male's erect penis.

iii. Multiple files of toddlers and children engaged in bondage and discipline, dominance and submission, sadism, and masochism, activities.

c. A review of the Gonzalez iPhone and the Gonzalez iPad identified messages that were indicative of discussions about engaging in sexually explicit conduct¹ with children and the exchange of child pornography. For example, on or about May 14, 2023, GONZALEZ communicated on a particular messenger service ("Application-3") with another application user who discussed raping children in the name of Satan.

7. On or about November 22, 2024, the Honorable Stewart D. Aaron, United States Magistrate Judge in the Southern District of New York, authorized a historical cellphone location warrant for the phone number assigned to the Gonzalez iPhone.

a. Based on my review of the data provided in response to that November 22, 2024 warrant, and other analyses of that data prepared by other law enforcement officers, I have learned that between at least on or about January 16, 2023 and on or about January 18, 2023, the Gonzalez iPhone was frequently located in the vicinity of a particular cellphone tower in the East Village neighborhood of Manhattan, consistent with User-1's statement to the UC Alias on or about January 16, 2023 that he was residing in the East Village.

b. For instance, cellphone location data for the Gonzalez iPhone shows that on or about January 18, 2023, the phone was located in the East Village at a time within approximately five minutes of User-1 sending the UC Alias a link containing child pornography as described above. *See supra* ¶ 5e.

c. Similarly, cellphone location data for the Gonzalez iPhone shows that on or about April 3, 2023, the phone was located in midtown Manhattan within approximately six minutes of User-1 sending the UC Alias a link containing child pornography as described above. *See supra* ¶ 5f.

Identification of SAMUEL GONZALEZ

8. As described below, based on my involvement in this investigation, including my conversations with other law enforcement officers and my review of records and reports, I believe that User-1 is SAMUEL GONZALEZ, the defendant:

¹ "Sexually explicit conduct" as used herein, is defined as set forth in Title 18, United States Code, Section 2256.

a. *Communications*: An initial forensic review of the Gonzalez Devices, pursuant to the judicially-authorized search warrant, revealed communications of User-1 using Application-1 and Application-2, including communications that the UC Alias had previously engaged in with User-1. *See supra* ¶¶ 4-5.

b. *Name*: As noted above, GONZALEZ shares the same initials, “S G,” as User-1’s account nickname on Application-2. In addition, GONZALEZ shares a common nickname for his first name—“sammy”—as User-1 used in his account username on Application-1. *See supra* ¶ 4(a).

c. *Age*. In or about January 2023, User-1’s profile on Application-1 described User-1 as being 29 years old. GONZALEZ’s New York State driver’s license reflects that GONZALEZ was 29 years old, as of January 2023, when User-1 first contacted the UC Alias.

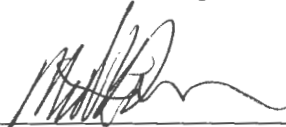
d. *Photographs*. A photograph of User-1 on Application-1 and the photograph User-1 sent to the UC Alias on Application-2 match other photographs of GONZALEZ, including a photograph of GONZALEZ from a New York City acting school’s website and a photograph taken for GONZALEZ’s New York State driver’s license.

e. *Personal Residence*. The address that the FBI searched pursuant to a judicially-authorized search warrant in or around June 2023, and during which they recovered the devices with communications with the UC Alias, is the same address as that listed on GONZALEZ’s New York State driver’s license.

f. *Employment*. User-1’s profile on Application-1 described User-1 as a “performer.” *See supra* ¶ 5(b). Based on my review of publicly available websites, I have learned that GONZALEZ is an actor, dancer, theater producer, as well as a former teacher at an acting school in New York City.

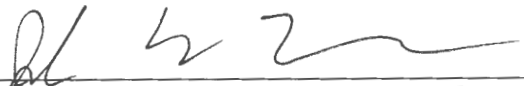
9. Accordingly, there is probable cause that SAMUEL GONZALEZ, the defendant, possessed and shared child pornography, including (i) by distributing approximately 1500 files of child pornography to the UC Alias; and (ii) possessing at least approximately 87 visually unique files of child pornography, consisting of approximately 18 videos and 69 images, on his devices.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of SAMUEL GONZALEZ, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



MATTHEW DERAGON
Special Agent
FBI

Sworn to before me this 25 day of April, 2025.



THE HONORABLE JENNIFER E. WILLIS
United States Magistrate Judge
Southern District of New York