

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CHRISTOPHER WARD,

Defendant.

COMPLAINT

Violations of 18 U.S.C. § 2252A

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

SHAMEL MEDRANO DE LA CRUZ, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), and charges as follows:

COUNT ONE

(Receipt and Distribution of Child Pornography)

1. From at least on or about July 14, 2024 through at least on or about July 22, 2025, in the Southern District of New York and elsewhere, CHRISTOPHER WARD, 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, WARD distributed files containing sexually explicit images of minors from at least one electronic device in New York, New York via a messaging application.

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

COUNT TWO

(Possession of Child Pornography)

2. From at least on or about July 14, 2024 through at least on or about July 22, 2025, in the Southern District of New York and elsewhere, CHRISTOPHER WARD, 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, WARD possessed on at least one electronic device sexually explicit images of minors, including images of prepubescent minors and minors who had not attained 12 years of age, in his residence in Manhattan, New York.

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

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

3. I have been employed as a Special Agent for the USAO-SDNY since December 2024, and I was previously an Investigative Analyst for the USAO-SDNY for approximately six years. In my law enforcement capacity, my duties include investigating a wide array of federal crimes, including crimes against children, child sexual exploitation, and child pornography offenses.

4. I have been personally involved in the investigation of this matter. I am familiar with the information contained in this Complaint based on my participation in the investigation; my conversations with law enforcement officers and others; my review of law enforcement reports and records, audio recordings, photographs, videos, cyber tipline reports from the National Center for Missing and Exploited Children (“NCMEC”), and telecommunications, internet, and social media service provider records; and my training and experience. Because this Complaint is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included the details of every aspect of the investigation. Where the contents of documents, audio recordings, photographs, and videos and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Offense Conduct

5. Based on my involvement in the investigation, including my conversations with law enforcement officers and others and my review of documents, reports and records, audio recordings, photographs, and videos, I have learned the following, in substance and in part:

a. A particular application (“Application-1”) is an electronic mobile messaging application that allows for one-on-one chats, group conversations, and sharing media like photographs and videos. Users can access Application-1 from various devices, including smart phones, tablets, computers, and other electronic devices.

b. Beginning in or about 2024, Application-1 notified NCMEC that a particular user (“User-1”) uploaded images and other media files containing child pornography onto Application-1. In particular, Application-1 determined that, between approximately July 2024 and July 2025, User-1 uploaded approximately hundreds of files containing child pornography onto Application-1 (the “Subject Files”) from multiple locations using particular Internet Protocol (“IP”) addresses¹ located in or around New York State. User-1 uploaded the Subject Files using various usernames, including multiple usernames with similar spellings that were distinguished by accompanying numerical combinations (the “Application-1 Accounts”). Based on my review of these usernames, as well as my training and experience, I believe that User-1 used these multiple usernames in an apparent attempt to disguise his identity.

c. Based on my review of information provided by NCMEC, I have learned that User-1 uploaded approximately hundreds of the Subject Files onto Application-1 using a particular IP

¹ Based on my training and experience, I know that each electronic device connected to the internet must be assigned a unique IP address so that communications from or directed to that electronic device are properly routed.

address ending in -181 (“IP Address-1”) and a second particular IP address ending in -93 (“IP Address-2”).

i. Based on my review of internet service provider records, I have learned that IP Address-1 is the IP address assigned to a particular modem located at a particular residence located in Lindenhurst, New York (“Residence-1”). Based on my conversation with relatives of WARD’s, I have learned that WARD occasionally resided at Residence-1 from approximately 2021 to 2024.

ii. Based on my review of records provided by a particular internet service provider (“Internet Provider-1”) and my conversations with Internet Provider-1’s personnel, I have learned that IP Address-2 is the IP address assigned to a particular modem located at a particular residence located in Farmingdale, New York (“Residence-2”), and that the registered account holder of IP Address-2 is a family member of WARD’s. Based on my review of law enforcement databases, I have also learned that from approximately 2023 to 2025, WARD listed Residence-2 as the address on his vehicle registration.

d. Based on my review of information provided by NCMEC, I have further learned that between approximately January 2025 and July 2025, User-1 uploaded approximately hundreds of the Subject Files onto Application-1 using a third particular IP address ending in -89 (“IP Address-3”) and a fourth particular IP address ending in -140 (“IP Address-4”). Based on my review of records from Internet Provider-1 and my conversations with Internet Provider-1’s personnel, I have learned that IP Address-3 and IP Address-4 are the IP addresses assigned to a particular modem located at a particular apartment located in Manhattan, New York (“Apartment-1”). My review of Internet Provider-1’s records further revealed that the registered account holder and user of IP Address-3 and IP Address-4 is “Christopher Ward.”

e. Based on my review of the Subject Files identified by Application-1, I have determined that the Subject Files contain what appears to be child pornography. Such files include, among other things, videos that depict prepubescent females between approximately five and eleven years old performing oral sex on adult males, engaging in vaginal and anal penetration with foreign objects, and performing other sexual acts.

Identification of CHRISTOPHER WARD

6. As explained below, I believe that CHRISTOPHER WARD, the defendant, is User-1. This conclusion is based on the following, which I have learned from my involvement in the investigation, my review of documents, communications, and audio recordings, and my conversations with law enforcement officers and others:

a. *Name:* As noted above, WARD shares the same name, “Christopher Ward,” as the individual who is the registered account holder and user of IP Address-3 and IP Address-4, from which, as set forth above, User-1 uploaded approximately hundreds of the Subject Files onto Application-1.

b. *Address:* Based on my conversations with witnesses and my review of internet service provider records, law enforcement records, and other communications, I have learned the following about Residence-1, Residence-2, and Apartment-1—that is, the residences from where User-1 uploaded approximately hundreds of the Subject Files onto Application-1:

i. Based on my conversations with relatives of WARD's and my review of law enforcement records, including notes of interviews conducted with witnesses, between approximately 2021 and 2024, WARD occasionally resided at Residence-1.

ii. Based on my review of government databases and records, Residence-2 is listed as the address on WARD's driver's license, vehicle registration, and employee personnel records.

iii. As described below, on or about September 8, 2025, WARD's cellphone ("Cellphone-1") was turned over to law enforcement. My review of Cellphone-1, conducted pursuant to a judicially authorized search warrant, revealed an e-mail dated approximately November 27, 2024, which contained details about WARD's apparent leasing of Apartment-1, including that the lease began on or about January 1, 2025, that the move-in date was also in or about January 2025, and other details, including the price for the lease and particular information identifying Apartment-1.

iv. Based on my review of Internet Provider-1's records, I have also learned that in or about January 2025, Internet Provider-1 began providing Apartment-1 with internet under WARD's name, first through using IP Address-3 and then through using IP Address-4. Internet Provider-1's records further revealed that although IP Address-3 was deactivated in or about June 2025, IP Address-4 remains the active IP address for Apartment-1.

v. Accordingly, and based on the information set forth above, I believe that since approximately January 2025, WARD has resided at Apartment-1.

c. *WARD's Admissions:* Based on my conversations with other law enforcement officers and my review of audio recordings, I have learned that on or about September 6, 2025, certain of WARD's relatives, including a particular individual ("Individual-1"), recorded a conversation they had with WARD.² During that recorded conversation, WARD admitted, in substance and in part, that he received videos containing child pornography on Application-1 and that on at least approximately 30 different occasions, he forwarded those files to others.

d. *Cellphone:* On or about September 6, 2025, WARD voluntarily provided his cellphone, Cellphone-1, to Individual-1, and on or about September 8, 2025, Individual-1 and another individual known to WARD turned over Cellphone-1 to law enforcement.

i. On or about September 13, 2025, I searched Cellphone-1 pursuant to a judicially authorized search warrant and confirmed Cellphone-1 was used by WARD. For example, Cellphone-1 listed WARD's first name in the device name and contained, among other things, photographs depicting WARD and an account maintained by a particular service provider ("Service Provider-1") that was registered in WARD's name.

ii. Based on my conversation with forensic analysts who reviewed Cellphone-1's data usage, I have learned that Cellphone-1 contains data usage markers that indicate that Application-1 had been previously downloaded onto and used on Cellphone-1. The

² The individuals who recorded their conversation with WARD, including Individual-1, acted independently and not at the direction of law enforcement. On or about September 8, 2025, Individual-1 provided an audio recording of the conversation with WARD to law enforcement.

review of Cellphone-1 further revealed that Application-1 was no longer present on Cellphone-1, suggesting that WARD deleted Application-1 in a possible attempt to destroy evidence.

e. *Phone Number*: Based on my review of information provided by NCMEC and my review of service provider records, I have learned the following:

i. Based on my review of information provided by NCMEC, in addition to using IP Address-1 through -4 to upload several of the Subject Files onto Application-1, User-1 logged into the Application-1 Accounts on at least several occasions by using IP addresses maintained by a particular telecommunications service provider (“Cellular Provider-1”). As set forth below, Cellular Provider-1 is the service provider for Cellphone-1, which, as described above, was used by WARD.

ii. Based on my review of Cellphone-1 and records provided by Cellular Provider-1, I have learned that Cellphone-1’s call number is a particular phone number ending in -7793 (the “7793 Number”), and that Cellular Provider-1 has been the service provider for the 7793 Number since approximately 2022. I have further learned that Cellular Provider-1 remained the service provider for the 7793 Number throughout the period when the Subject Files were uploaded onto Application-1 (*i.e.*, throughout approximately July 2024 to July 2025).

iii. Based on my review of records provided by Service Provider-1 and a particular social media service provider (“Social Media Provider-1”), the 7793 Number is the verified phone number for particular accounts maintained by Service Provider-1 and Social Media Provider-1 that are subscribed to in WARD’s name.

iv. Accordingly, and based on the information set forth above, I believe that WARD used Cellphone-1, assigned the 7793 Number, to upload certain of the Subject Files onto Application-1.

f. *Employment*: Based on my review of communication records and my conversations with law enforcement officers and others, I have learned the following:

i. Based on my review of information provided by NCMEC, I have learned that on or about July 14, 2025, a particular individual who is believed to be User-1 logged onto Application-1 using one of the usernames referenced above, *see supra* ¶ 5(b), and IP Address-4—that is, an IP address that is associated with WARD’s apartment in Manhattan, New York, and was used by User-1 to upload approximately hundreds of the Subject Files onto Application-1.

ii. On or about that same day, July 14, 2025, User-1 participated in a chat conversation on Application-1 with another particular user (“User-2”). During the chat conversation, User-1 claimed to be a fourth-grade teacher, and User-2 claimed to be a substitute teacher. Both User-1 and User-2 discussed being sexually attracted to their respective students, and User-1 provided details about specific children to whom he has been sexually attracted.

iii. Based on my review of records provided by the New York City Department of Education (“NYC-DOE”), WARD was employed as a first-grade teacher at a particular school located in Manhattan, New York from approximately January 2021 to approximately June 2024. I have further learned, based on my review of records provided by the NYC-DOE, that WARD was employed as a first-grade teacher at a particular elementary school

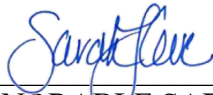
located in Queens, New York from approximately September 2024 to approximately September 2025. Based on the foregoing, *see supra* ¶¶ 6(a)-(f), I believe WARD is User-1.

7. Accordingly, there is probable cause that CHRISTOPHER WARD, the defendant, possessed, received, and distributed multiple files containing child pornography, including (i) uploading approximately hundreds of files containing child pornography onto Application-1 between approximately July 14, 2024 and July 22, 2025, and (ii) possessing at least approximately hundreds of files containing child pornography in his Manhattan apartment.

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

/s Shamel Medrano De La Cruz (By Court with
Authorization)
SHAMEL MEDRANO DE LA CRUZ Special
Agent
United States Attorney's Office Southern District of
New York

Sworn to me through the transmission of
this Complaint by reliable electronic means
(telephone), on this 23rd day of September, 2025.



THE HONORABLE SARAH L. CAVE
United States Magistrate Judge
Southern District of New York