AB:EHS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- X

UNITED STATES OF AMERICA

- against -

KURBONALI SULTANOV,

Defendant.

- X

COMPLAINT

22-MJ-247

(T. 18, U.S.C., § 2252(a)(4)(B))

EASTERN DISTRICT OF NEW YORK, SS:

JOSHUA CROFT, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about March 5, 2022, within the Eastern District of New York, the defendant KURBONALI SULTANOV did knowingly and intentionally possess with intent to view matter containing one or more visual depictions, to wit: images in digital files contained within electronic devices provided to law enforcement by the defendant, and which visual depictions had been mailed, and shipped and transported in, and using a means and facility of, interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means, including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(4)(B)).

The source of your deponent's information and the grounds for his belief are as follows[1]:

1. I am a Special Agent with HSI and have been since December 2016. I am currently assigned to the Child Exploitation Investigations Unit. During my tenure with HSI, I have participated in the investigation of cases involving crimes against children. Specifically, I have experience investigating cases involving production, receipt, distribution, and possession of child pornography and have conducted physical and electronic surveillance, executed search warrants, reviewed and analyzed electronic devices, and interviewed witnesses. As part of my employment with HSI, I successfully completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and Immigration and Customs Enforcement Special Agent Training, both of which included instruction with respect to the application for, and execution of, search and arrest warrants, as well as the application for criminal complaints, and other legal processes. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to conceal their actions from detection by law enforcement.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from

[1] Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

my personal participation in the investigation, my review of documents, my training and experience and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. On or about March 5, 2022, KURBONALI SULTANOV landed at John F. Kennedy International Airport, traveling from Uzbekistan via Istanbul. He was stopped by United States Customs and Border Protection ("CBP"). A border search was conducted. During the search, KURBONALI SULTANOV voluntarily gave CBP officers his cell phone's password. Upon manually reviewing his cell phone, CBP officers identified that there was child sexual abuse material on the cell phone.

4. I then reviewed the cell phone and confirmed that the device contained approximately 10 videos containing child sex abuse material. Specifically, there were, among others, videos of, for example (1) an approximately ten minute long video showing an approximate four-year-old female toddler laying on a bed with a pubescent 12-16 year old female who was topless; an adult male forces the older female to perform oral sex on the toddler; the video finishes with him performing penetrative sex on the toddler; (2) an approximately two minute video of a 12-14 year-old female inserting two red markers or pens into her vagina; and (3) a video of a 12-14 year old female using the handle of a hairbrush to masturbate.

5. After being given a Miranda warning and agreeing to waive his Miranda rights, the defendant provided a voluntary confession to law enforcement officers,

during which he explained that he bought the child sexual abuse materials online on a Russian social media platform and paid for them via PayPal. He downloaded and purchased the child sex abuse materials in the United States, brought the images to Uzbekistan and then brought them back to the United States.

WHEREFORE, I respectfully request that KURBONALI SULTANOV be dealt with according to law.

Joshua Croft

JOSHUA CROFT
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me by telephone this
___7th day of March, 2022

Taryn A. Merkl

THE HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK