

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Special Agent Casey Hyde, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Immigrations and Customs Enforcement, Homeland Security Investigations (“HSI”), assigned to the office of the Special Agent in Charge (“SAC”) New England. I have been a Special Agent since January 2022, and I am assigned to the Child Exploitation and Forensics Group. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors. My formal law enforcement training includes successfully completing the Criminal Investigator Training Program, the Homeland Security Investigations Special Agent Training, and the Basic Immigration Enforcement Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I also have successfully completed the Uniformed Police Training Program at the Federal Law Enforcement Training Center in Artesia, New Mexico. In addition to this training, I have had the opportunity to speak with and observe several other federal, state, and local law enforcement officers who have extensive experience in child exploitation investigations. I have participated in investigations of violations of those statutes to include assistance with the execution of federal search warrants in connection with such investigations. I have received both formal and on the job training in the investigation of child pornography and have reviewed examples of child pornography as defined in 18 U.S.C. § 2256.

2. Prior to my tenure as a Special Agent, I was employed as a Deportation Officer by Immigration and Customs Enforcement, Enforcement and Removal Operations. I also was

employed by the United States Capitol Police as a Police Officer. My education includes a Bachelor of Arts degree in Criminal Justice with a minor in Forensic Science from Saint Anselm College in Manchester, New Hampshire.

3. I submit this affidavit in support of a criminal complaint charging Christopher SHEERER (YOB 1988) with one count of distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

4. The statements in this affidavit are based in part on information provided by federal agents and law enforcement officers; written reports about this investigation that I have received, directly or indirectly, from other law enforcement agents; my personal observations; review of records; independent investigation and analysis by federal agents/analysts; and my experience, training, and background as a Special Agent with HSI.

5. Because this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, 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 to believe that Christopher SHEERER committed violations of 18 U.S.C. § 2252A. Where statements of others are set forth in this affidavit, they are set forth in substance and in part and not verbatim unless indicated otherwise.

STATEMENT OF PROBABLE CAUSE

The Baltimore Investigation

6. On July 18, 2024, HSI obtained federal warrants to search the person and Boston residence of Christopher SHEERER (YOB 1988). The affidavit submitted in support of the applications for those warrants is attached hereto as **Sealed Exhibit A**. The following paragraphs summarize certain information contained within Sealed Exhibit A.

7. In May of 2024, HSI-Baltimore began an investigation into a user of Chat Application A,¹ a secure messaging platform that allows users to exchange text, photographs, videos, and other types of files both in one-to-one conversations and in group chats.

8. The user of Chat Application A was associated with an IP address that resolved to Johns Hopkins University in Baltimore (hereinafter, the “Suspect User”).²

9. As part of the investigation, HSI-Baltimore gained access to portions of the Suspect User’s account. In reviewing that information, agents observed that the Suspect User had been active in a Chat Application A Verified Group (“the Verified Group”) associated with child sexual abuse material.³ HSI-Baltimore also received information regarding the Verified Group, which is described as a place for “dads, uncles, and babysitters” to chat, share live material, and meet up. The Verified Group requires prospective members to verify their status as a male guardian or family member by uploading a naked photo of a child under 13 next to a handwritten sign bearing the name of the Verified Group.

10. Based on information observed in the Suspect User’s account, agents learned that the Suspect User was a member of the group, and claimed to be the father of a five-year-old girl. Agents also observed imagery in the Suspect User’s account that depicted a young female child,

¹ The name of Chat Application A is known to law enforcement but redacted here to protect the integrity of ongoing investigation into other users of Chat Application A.

² The Suspect User’s username is redacted herein to protect the integrity of ongoing investigation into other users of Chat Application A who communicated with him.

³ “Child pornography” is a term defined by statute as “any visual depiction...of sexually explicit conduct, where the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct.” See 18 U.S.C. § 2256(8)(A). In recent years, child pornography has been more widely referred to as “child sexual abuse material (CSAM),” including by law enforcement and the National Center for Missing and Exploited Children. Where that term is used in this affidavit, it is used to refer to child pornography as defined by federal statute.

naked, with her genitals exposed. In one photo of the child, there is a card visible with the name of the Verified Group written on it.

11. HSI-Baltimore was able to identify an email account with an address that contained the Suspect User's name (hereinafter, "Google Account-1"). Records for Google Account-1 include a phone number ending in -0797 (hereinafter, the "Suspect Phone") and an IP address resolving to Johns Hopkins. Agents traced the phone number to Christopher SHEERER (YOB 1988). Further investigation revealed that SHEERER was a pediatric anesthesiology fellow at Johns Hopkins and that he maintained a residence in Lancaster, Pennsylvania. Agents also determined that SHEERER and his ex-wife have a daughter (YOB 2018).

12. HSI-Baltimore obtained a federal warrant to search Google Account-1, which includes (among other things) pictures of SHEERER, including a selfie-style photo in which SHEERER is wearing scrubs and a Johns Hopkins lanyard. In one email located in the account, the user identifies himself as "Chris," indicates that the account is his "burner email," and gives his phone number as the Suspect Phone. In another email, the user indicates that he had a work apartment next to Hopkins Hospital. Based on information provided by Google, agents identified and obtained federal warrants to search several other email accounts linked to Google Account-1, including two whose addresses included variations of SHEERER's name.

13. Based on that information, HSI determined that SHEERER was the user of the Suspect Account, Google Account-1, and the other associated Google accounts.

14. In one Google Account-1 email exchange in July 2023, SHEERER wrote, "I love an uncircumcised guy. And young boys too."

15. In one of those accounts (Google Account-4), agents discovered a video that appeared to be the same as the one visible in the Suspect Account. The video is approximately 9

seconds in length and depicts a prepubescent female child whose appearance is consistent with that of a five-year-old, naked with her genitals exposed, in an apparent bathtub. The minor female is playing in the water with toys floating around her. At the end of the video, an apparent adult male hand touches the knee area of the minor female. Metadata shows that the video was created on June 10, 2023.

16. Google Account-4 also includes photographs of SHEERER's Lancaster residence, including of the bathroom. The bathroom floor appears to be the same as that in images visible in the Suspect Account (where the female child is visible along with a hand holding a card with the name of the Verified Group written on it), as described above.

17. Google Account-4 also included information indicating that SHEERER was beginning a fellowship in pediatric cardiac anesthesiology at Harvard Medical School / Boston Children's Hospital in July 2024, as well as confirmation of a flight booked from Boston to Philadelphia on the evening of July 19, 2024 in advance of a custodial visit with his daughter.

Execution of the Boston Search Warrants

18. HSI determined that SHEERER lived at a particular residence in Boston. On July 18, 2024, HSI executed the warrants for SHEERER's person and residence at approximately 8:00 p.m. Agents observed SHEERER walking up his street to the residence, wearing hospital scrubs and a backpack bearing the logo of Boston Children's Hospital. Agents made contact with SHEERER outside of the external door to the apartment building, identified themselves, and explained that they had search warrants for his person and apartment. Agents took SHEERER's backpack from him and searched it; SHEERER retrieved an Apple iPhone 15 Pro Max from his pocket and handed it to agents. The phone was locked at that time.

19. After agents confirmed there were no other occupants inside, three agents

accompanied SHEERER to his apartment, where they began speaking. Other agents conducted an initial forensic review of the Apple iPhone 15 Pro Max.

Forensic Review

20. During review of the Apple iPhone 15 Pro Max, agents observed SHEERER's photograph as the profile picture for his contact card. The phone number associated with the phone ended in -0797 (*i.e.*, it was the Suspect Phone number).

21. Agents also observed Chat Application A installed on the phone and that the Suspect Account was logged in. The phone number associated with the Chat Application A account was the Suspect Phone number.

22. Within Chat Application A on the phone, agents observed approximately 38 visible chats, including both one-to-one conversations and group chats. Some of the chats consisted only of messages; some contained photos and videos. Of those, several chats included the exchange of child pornography. The child pornography depicted children ranging in age from infants to pubescent teenagers and some videos included dogs, bondage, the lascivious exhibition of children's genitals, and the sexual abuse of children by adults. The majority of the children depicted were boys but some imagery depicted girls. In some of the chats, SHEERER offered pictures of a child known to him.⁴

23. In a one-to-one chat on July 1, 2024, SHEERER distributed three pictures and 15 videos, all of which appear to be child pornography. One of those videos is described as follows:

- a. The video is 36 seconds long and depicts a child who, based on his facial features and size, appears to be a two- to four-year-old boy with blonde hair, wearing an

⁴ The nature of SHEERER's relationship with this child is known to law enforcement but redacted here to avoid disclosure of the child's identity. The child will be referred to as "Minor A."

orange sweatshirt that says “dinosaur hunter.” An adult male penis and hand is visible in the frame, as is a distinctive tartan/plaid holiday blanket with white lettering. The adult male is naked from the waist down. The male has the child perform oral sex on his penis, and at some point while this is happening, a dog walks into the frame and tries to lick the child’s face. The video appears to be a saved video from another social media account.

24. In a group chat consisting of 368 members, the purported rules of membership for the group are advertised as “boys under 18, all types. Toddlers, Hardcore, Rape, Cry. No zoo/blood.” There is a pinned message at the top of the chat, which says “Boys group. Share to your friends.” One of the videos uploaded by another group member on July 15, 2024 is described as follows:

a. The video is two minutes and 21 seconds long, and depicts a child who, based on his size and facial features, appears to be approximately two to four years old. The child has a red mark (apparent injury) under his right eye. The child has blondish hair and is wearing a blue plaid pajama top. There is an orange and yellow blanket visible in the frame. The video shows an adult male having the child perform oral sex on the adult male, whose face is not visible.

SHEERER’s Interview

25. SHEERER waived his rights pursuant to *Miranda* and agreed to be interviewed. The interview was recorded and is merely summarized here. During the interview, SHEERER confirmed that he started a fellowship at Boston Children’s Hospital in pediatric cardiac anesthesiology on July 1 and had been in Boston for about three weeks. He indicated that his schedule varies and that on that particular day, he had been in the operating room for approximately 12 hours.

26. SHEERER confirmed that the phone taken from his pocket was his. He gave agents the passcode.

27. When asked about what apps he used, he acknowledged that he had used Chat Application A but said that he hadn't used it in a couple of years. He initially claimed to have used the app to communicate with other doctors, and later indicated that he used it to communicate with people he was dating. SHEERER admitted that Google Account-1 was his, and indicated that he used it to communicate with people he was dating.

28. SHEERER denied having seen child pornography on the internet, and offered that he had never downloaded and saved it. When confronted with the assertion that there was child pornography on his phone, he told agents that he did not know how it got there.

29. Agents paused the interview to review evidence located on SHEERER's phone. When they resumed, they reminded SHEERER of his rights pursuant to Miranda and confirmed that he wished to continue speaking with them. They informed him that they had located child pornography in his Chat Application A account on the phone. SHEERER continued to disavow knowledge of how that child pornography got onto his device.

30. Agents paused the interview a second time and returned with the phone to show SHEERER certain material from Chat Application A. Agents presented him with one chat, which spanned June 11, 2023 through September 2023, in which he was discussing Minor A and distributed to another user pictures and videos of a child believed to be Minor A. SHEERER admitted that one of the videos showed Minor A in the tub, but said that he didn't know who could have gotten the video and sent it out under his account.⁵ Agents showed SHEERER another video

⁵ This appears to be the same video as that described in Paragraph 15 of this affidavit and Paragraph 51 of Sealed Exhibit A.

of a child believed to be Minor A, in which a hand can be seen with a sign with the handwritten name of the Verified Group. Agents showed SHEERER a third image from his Chat Application A account, which showed a child believed to be Minor A squatting naked on the bathroom floor and a hand holding the same note bearing the handwritten name of the Verified Group.⁶ SHEERER denied that she was Minor A.

31. During the search warrant, investigators seized an HP laptop, an Apple MacBook Air, an iPad, an Apple Watch, and an iPhone. Apart from the iPhone, all devices were seized from SHEERER's apartment. Forensic review of the seized devices is ongoing.

CONCLUSION

32. Based on all of the foregoing information, I submit that there is probable cause to believe that:

a. from on or about July 1, 2024 through on or about July 18, 2024, Christopher SHEERER knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so, all in violation of Title 18 United States Code Sections 2252A(a)(2) and (b)(1);

b. on July 18, 2024, Christopher SHEERER knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any

⁶ This video and this image appear to be the same referenced in Paragraph 10 of this affidavit and depicted as screenshots in Paragraph 24 of Sealed Exhibit 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, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so, all in violation of 18 U.S.C. § 2252A(5)(b).

Respectfully submitted,

Casey Hyde /by Paul G. Levenson
Casey Hyde
Special Agent, HSI

Sworn to before me telephonically in accordance with Fed. Rule Crim. P. 4.1 on this 19th day of July, 2024.



Hon. PAUL G. LEVENSON
United States Magistrate Judge

