

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MICHAEL MEYERS,

Defendant.

23 MJ 7270

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 2251(a), (e),  
2252A(a)(2)(B)

COUNTY OF OFFENSE:  
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

Pao Mei Fisher, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

**COUNT ONE**  
**(Sexual Exploitation of a Child)**

1. On or about March 18, 2023, in the Southern District of New York and elsewhere, MICHAEL MEYERS, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, and attempted to do so, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, MEYERS induced a 16-year-old minor ("Victim-1") to engage in sexually explicit conduct, photograph the conduct, and transmit the photographs over the Internet to MEYERS in Orange County, New York.

(Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TWO**  
**(Receipt and Distribution of Child Pornography)**

2. On or about March 18, 2023, in the Southern District of New York and elsewhere, MICHAEL MEYERS, the defendant, knowingly received and distributed material that contains child pornography using a means and facility of interstate and foreign commerce and that has been mailed and has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, MEYERS received files containing sexually explicit images of Victim-1 on a computer in Orange County, New York via an online application.

(Title 18, United States Code, Sections 2252A(a)(2)(B))

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

3. I am a Special Agent with the FBI, assigned to the Hudson Valley Resident Agency and the Safe Streets Task Force. I have been a Special Agent with the FBI since January 2017. During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity 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.

4. 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.

#### Definitions

5. The following terms have the indicated meaning in this Complaint:

a. The terms “minor,” “sexually explicit conduct,” and “visual depiction,” as used herein, are defined as set forth in Title 18, United States Code, Section 2256.

b. The term “child pornography,” as used herein, is a visual depiction of a minor involved in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(8).

c. An Internet Protocol (“IP”) address is a unique numeric address used to identify a particular computer connected to the Internet. An IP address looks like a series of numbers separated by periods. Every computer connected to the Internet must be assigned an IP address so that communications from or directed to that computer are routed properly.

#### The Investigation

6. In July 2023, an FBI Online Covert Employee (“OCE-1”) began chatting with a user (“Chat Avenue User-1”) on the online application Chat Avenue. In the chats between OCE-1 and Chat Avenue User-1, OCE-1 posed as the father of a 13-year-old girl from Arkansas named “Jessie,” and OCE-1 and Chat Avenue User-1 discussed arranging for Chat Avenue User-1 and “Jessie” to meet and engage in sexual activity. Chat Avenue User-1 told OCE-1 that he lived in New York.

7. On or about July 25, 2023, Chat Avenue User-1 asked OCE-1 if “Jessie” was a virgin, and stated that he was “STD-free, and vasectomy-safe.” Chat Avenue User-1 expressed reservations about needing to wear a condom, and stated that he was “clean, and sterile” and hadn’t “worn one in 20 years.” Chat Avenue User-1 asked about “Jessie’s” prior sexual activity and said, “[s]o she can probably take my 6 ok.”

8. Chat Avenue User-1 told OCE-1 that he was 61 years old and worked in special education “in the schools.” Chat Avenue User-1 provided OCE-1 with a phone number ending in 8400 (the “8400 Number”) so that he could exchange text messages with “Jessie.”

9. Following this conversation, OCE-1, now posing as “Jessie,” began exchanging text messages with Chat Avenue User-1 at the 8400 Number. On or about August 16, 2023, “Jessie” told Chat Avenue User-1 that she would give his phone number to her friend “Pam,” and told Chat Avenue User-1 that “Pam” lived in Pennsylvania closer to him. The same day, I began messaging with Chat Avenue User-1 in an undercover capacity, posing as “Pam.”

10. Between on or about August 16, 2023 and October 10, 2023, “Pam” communicated with Chat Avenue User-1 by phone and text message at the 8400 Number. During their communications, Chat Avenue User-1 indicated that he wanted to meet “Pam” in person to engage in sexual activity. On or about August 16, 2023, Chat Avenue User-1 asked “Pam” if she was 13, to which “Pam” responded that she was “[a]most 14 in November.” On or about September 19, 2023, Chat Avenue User-1 told “Pam” that he worked as a therapist in special education with kids with autism and down syndrome.

11. On or about September 28, 2023, Chat Avenue User-1 texted “Pam” that she should “sneak away for a day or night,” and stated that he would pick her up. Chat Avenue User-1 also told “Pam” that he would buy her things if she let him, including clothes.

12. On or about September 30, 2023, at approximately 11:08 p.m. (EST), Chat Avenue User-1 messaged “Pam,” asking if they could talk while she touched herself. The text-message conversation continued and Chat Avenue User-1 told “Pam” that she should “[g]et a hair brush.” Chat Avenue User-1 further instructed “Pam” to “[r]each up and in with your middle finger. Rotate your hand. Your cervix will feel ‘hard.’ You will like putting pressure on it. Your vagina is small. You should be able to reach it with that long finger.” Thereafter, at approximately 11:47 p.m. (EST), Chat Avenue User-1 sent “Pam” a video of a male in his underwear moving his fingers and giving verbal instructions, “rotate your hand and finger like this. Inside. All of the way up in and rotate it until you feel it.”

13. On or about October 2, 2023, “Pam” engaged in a recorded call with Chat Avenue User-1. Chat Avenue User-1 and “Pam” discussed meeting over the upcoming Columbus Day holiday. Chat Avenue User-1 said they could meet at a McDonald’s or a Dunkin Donuts and go to a hotel or motel. He suggested “Pam” should pretend to be his daughter, and they would go up to the room separately. During this call, Chat Avenue User-1 again talked about buying things for “Pam” and said that he could send her panties or money. During the call, Chat Avenue User-1 sent “Pam” a link to panties on Amazon and told “Pam” that he would email her an Amazon gift card. Chat Avenue User-1 gave “Pam” his Yahoo email address (“Email-1”) and told her to email him so that he would have her email. Shortly after “Pam” emailed Chat Avenue User-1, “Pam” received a \$50 gift card to the email address from which “Pam” had emailed Chat Avenue User-1.

14. During text communications on or about October 3, 2023, Chat Avenue User-1 told “Pam” that he couldn’t meet over the upcoming holiday because his ex-girlfriend wanted to get back together and he couldn’t lie to her. He also told “Pam” he was “hard right now ...

thinking about you.” Chat Avenue User-1 and “Pam” continued to chat, and on or about October 5, 2023, Chat Avenue User-1 asked “Pam” to speak on the phone and send him a picture.

15. I have reviewed records from Chat Avenue. These records indicate that Chat Avenue User-1 is associated with Email-1. I have reviewed Yahoo records which indicate that “Michael Meyers” is the subscriber of Email-1. I have also reviewed T-Mobile records, which indicate that the subscriber for the 8400 Number is “Michael Meyers” with an address in Port Jervis, New York (“Address-1”).

16. I have reviewed New York State Department of Motor Vehicles records for MICHAEL MEYERS, the defendant. Those records indicate that MEYERS is 62 years old (and was 61 on July 25, 2023) and identified Address-1 as his address. MEYER’s driver’s license photograph appears to depict the same individual in the profile picture for Chat Avenue User-1, as well as in photos Chat Avenue User-1 sent to “Pam.”

17. I have reviewed the website for a school (“School-1”) in Oceanside, New York. The website lists “Michael Meyers” as an Occupational Therapist at School-1. I have also reviewed records received from the school district of which School-1 is a part, which state that “Michael Meyers” began his employment as an occupational therapist within the school district on or about September 1, 1998.

18. On or about October 6, 2023, the FBI obtained a Search and Seizure Warrant for Address-1. During execution of the warrant, law enforcement seized multiple cell phones belonging to MICHAEL MEYERS, the defendant. I have reviewed reports of certain materials extracted from these cell phones by law enforcement agents specifically trained in the forensic examination of digital material. These reports include communications over Discord, an online social media application, by a user with a near identical username to Chat Avenue User-1 (“Discord User-1”). In one of these communications, Discord User-1 identifies his phone number as the 8400 Number, the number used by Chat Avenue User-1 and subscribed to by MEYERS.

19. Among the communications I reviewed are Discord messages exchanged between Discord User-1 and another account (“Discord User-2”) from on or about September 9, 2023, through on or about September 29, 2023. These messages include:

a. On or about September 9, 2023 at approximately 4:13 a.m. (UTC), Discord User-1 messaged Discord User-2, “Hi!” “So glad you are here!” “Is this you, [Female-1]?” Discord User-2 responded, “yes” and sent Discord User-1 a picture of what appears to be a prepubescent girl wearing a bra.

b. Discord User-1 responded, “Wow!”, to which Discord User-2 replied, “last year pic.” Discord User-1 wrote “So pretty!” and sent a picture of a man who appears to be MICHAEL MEYERS, the defendant. Discord User-2 asked, “my dad tell you my age.” Discord User-1 replied, “Yes. 11.” Shortly thereafter, Discord User-2 sends Discord User-1 a picture of what appears to be small female breasts. Discord User-1 asked if the photo was recent, to which Discord User-2 replied, “yes.”

c. A few minutes later, at approximately 4:23 a.m. (UTC), Discord User-2 told Discord User-1, “my dad takes most of my pics.” Discord User-1 replied “Wonderful!” “He

does well!!” Discord User-2 stated, “he likes looking at ne” and “i kinda like it.” Discord User-1 replied, “Ofc! So do I!” and “I hope we can have a few nice days together.” Discord User-2 asked Discord User-1, “u want another pic,” to which Discord User-1 replied, “Please.”

d. At approximately 4:29 a.m. (UTC), Discord User-1 asked Discord User-2 whether Discord User-2 has engaged in certain sexual acts with “Dad.” A few minutes later, Discord User-1 asked, “[h]as he bought you toys for that?” and stated, “I would do that for you!” “Your little kitty deserves it.” Later in the conversation, Discord User-1 said, “I hope Daddy shares you with me.”

e. At approximately 4:58 a.m. (UTC), Discord User-2 told Discord User-1 that their dad is there. Discord User-1 wrote, “Hi [Male-1]!” “She is terrific!” and “I hope you can send nice nice pics” At approximately 5:03 a.m. (UTC), Discord User-1 wrote, “I hope you will share [Female-1] with me.” Discord User-1 added, “I had a vasectomy.”

f. The next day, on or about September 10, 2023 at approximately 11:30 p.m. (UTC), Discord User-1 wrote Discord User-2, “Hi [Male-1]!” Discord User-1 and [Male-1] then discussed performing sexual acts with [Female-1]. Discord User-1 asked if [Male-1] has carried [Female-1] around “[w]hile in her.” Discord User-1 stated, “I do that, if I can” and added, “With younger, or lighter.”

g. At approximately 11:56 p.m. (UTC), Discord User-1 wrote Discord User-2, “Love looking at your daugh.” Discord User-1 also asked, “Yes! Have you facialed her?” Shortly thereafter, Discord User-1 wrote, “Thanks [Male-1]! Maybe the 3 of us? “Lots to do” “Mouth and pussy” and “I would spread her legs for you.” A few minutes later, Discord User-1 asked, “Almost 11. Right?” Discord User-2 responded, “10.”

20. The Discord messages I have reviewed from MEYER’s phones also include messages between Discord User-1 and another user (“Discord User-3”) on or about March 18, 2023. At approximately 8:02 p.m. (UTC), Discord User-1 directed Discord User-3, “Send a pic.” In response, Discord User-3 sent a picture of what appears to be the torso and face of a shirtless male in what appears to be a bathroom (“Picture-1”). Discord User-1 responded, “Omg so cute!” Discord User-1 then asked Discord User-3, “Your cock and ass?” In response, Discord User-3 sent Discord User-1 two sexually explicit photos, one of a penis (“Picture-2”) and one of the buttocks and scrotum of a male (“Picture-3”). The background of Picture-2 and Picture-3 appears to be the same as the background in Picture-1.

21. On November 17, 2023, I observed a forensic interview of a 17-year-old male who resides in Florida (“Victim-1”). Among other things, Victim-1 stated that Discord User-3 is his username, that he took Picture-1, Picture-2, and Picture-3 of himself while in a bathroom, and that he took and sent these pictures to an adult male (“Male-1”) via Discord when he was 16 years old at Male-1’s request. Victim-1 said that, after talking with Male-1 in a chat room, they began communicating on Discord. Victim-1 said that he told Male-1 he was 16 years old. Victim-1 stated that he did not send Picture-1, Picture-2, or Picture-3 to anyone else.

22. I have reviewed IP records received from Discord for Discord User-1. Those records indicate that on March 18, 2023, Discord User-1 started nine sessions on Discord, including sessions at 7:58 p.m. (UTC) and 8:02 p.m. (UTC), all from one IP address (“IP-1”).

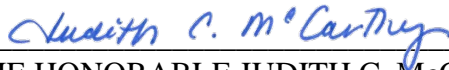
I have also reviewed IP records received from Snapchat for an account associated with “Michael Meyers” and the 8400 Number. Those records indicate that on March 18, 2023, there was activity on this account at 7:27 p.m. (UTC) and 11:33 (UTC) from IP-1. I reviewed records received from Charter Communications, which indicate that Address-1 in Port Jervis is the service address for IP-1 and that the subscriber is “Michael Meyers” with the 8400 Number.

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

/s/ Pao Mei Fisher by JCM w/permission

Pao Mei Fisher  
Special Agent  
Federal Bureau of Investigation

Sworn to me by reliable electronic means (by FaceTime),  
pursuant to Federal Rule of Criminal Procedure 4.1,  
this 20th day of November, 2023.

  
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THE HONORABLE JUDITH C. McCARTHY  
United States Magistrate Judge  
Southern District of New York