


Approved: 
Kathryn P. Wheelock
Assistant United States Attorney

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

----- x 23my3471
: **COMPLAINT**
:
UNITED STATES OF AMERICA : Violations of
: 18 U.S.C. Section
: 2422(b) and 2
-v.- :
: COUNTY OF OFFENSE:
ANAND SINGH, : WESTCHESTER
:
Defendant. :
----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

ERICA C. BUONOCORE, 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
(Attempted Enticement of a Minor)

1. Between at least on or about December 13, 2022 up to and including December 17, 2022, in the Southern District of New York and elsewhere, ANAND SINGH, the defendant, using facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly persuaded, induced, and enticed an individual who had not attained the age of 18 years to engage in a sexual activity for which a person can be charged, and attempted to do the same, to wit, ANAND SINGH, the defendant, in communications over the internet, communicated with an individual posing as a 14-year-old girl about arranging to engage in sexual activity and attempted to meet with the individual to engage in sexual activity.

(Title 18, United States Code, Sections 2422(b) and 2.)

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

2. I am a Special Agent with the FBI, assigned to the New York Office. I have been a Special Agent with the FBI for twelve years. 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 investigation.

3. 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.

4. On or about April 16, 2023, I received a report of a video uploaded to YouTube (the "Video") that depicted communications between an individual named "Anand" and an individual ("Reporter-1") posing as a 14-year-old girl named "Mia." In those communications, "Anand" indicated that he wanted to meet with Reporter-1 (posing as a 14-year-old girl) for the purpose of having sex.

5. I interviewed the individual associated with the account ("Reporter-2") that posted the Video on YouTube. Reporter-2 provided me with video footage and screen recordings¹ of communications between Reporter-1 and "Anand," who law enforcement later identified as ANAND SINGH, the defendant. Reporter-2 stated that in addition to communicating via text message, Reporter-1 communicated with "Anand" via a mobile dating application called "Hily." Reporter-2 stated that on Hily, "Anand" communicated with Reporter-1 using a profile with the username "Anon."

¹ A screen recording is a video recording of what appears on the screen of a device. It is comparable to a screenshot.

6. Based on my review of records from Hily and cell phone screen recordings of the "Anon" Hily profile (the "Profile"), I am aware of the following:

a. The Profile displayed "Anon, 33" at the top, indicating to me that "Anon" identified himself on the application as 33 years old.

b. The Profile is associated with a particular phone number ending in -6874 (the "6874 Phone Number"). As described in paragraph 10(a), below, ANAND SINGH, the defendant, is listed as a customer of the 6874 Phone Number.

c. The Profile contained various photos of a male individual who appears to be SINGH, based on my review of a photograph of SINGH in a New York state criminal history employer background check report.

d. The Profile communicated with Reporter-1 on or about December 12 and 13, 2022.

7. Based on my review of a New York State criminal history employer background check report, I am aware that ANAND SINGH, the defendant, was born in 1989 and is currently 33 years old.

8. I interviewed Reporter-1, who provided me with consent to log into the mobile application (the "Texting App") that she stated she had used to communicate via text message with the 6874 Phone Number. Reporter-1 provided me her credentials and I logged into the Texting App. I have reviewed communications in the Texting App between Reporter-1 and the 6874 Phone Number.

9. Based on my review of the Hily and Texting App communications between Reporter-1 and "Anon" and the 6874 Phone Number, respectively, I have learned the following:

a. On or about December 12 and 13, 2022, Reporter-1 engaged in communications with ANAND SINGH, the defendant, who was using the screen name "Anon," on Hily. "Anon" asked Reporter-1 "[w]hatcha looking for on here," referring to the Hily application. Reporter-1 responded "hookups." "Anon" then asked Reporter-1 "You wanna see a pic of my cock?"

b. Reporter-1 then asked "Anon" to text his name to Reporter-1 at a particular phone number ending in -8325 (the "Reporter-1 Phone Number"). "Anon" responded that his name was

"Anand," and subsequently transitioned the communications to text message.

c. On or about December 13, 2022 at 1:47 a.m., SINGH texted Reporter-1 from the 6874 Phone Number. SINGH explained that the screen name "Anon" on the Hily application was "short for anonymous." Two minutes later, he also told Reporter-1 that he "work[ed] for the government."² SINGH then sent four photos of himself (two with women in them) to Reporter-1, which I know to be photos of SINGH because I am familiar with his appearance based on my review of a photograph from SINGH's New York State criminal history employer background check report.

d. At approximately 1:53 a.m., SINGH stated to Reporter-1 "young girls usually rock my world" and asked Reporter-1 her age. Reporter-1 advised "I'm younger than what I was listed on the app" and stated that she is "14." In response, SINGH initially said that Reporter-1 was "too young," but one minute later stated "I bet you're fuckin fun to be with" and "[h]oly shit you must be tight."

e. At approximately 2:03 a.m. on December 13, 2022, SINGH asked Reporter-1 "[y]ou got any pics?" Reporter-1 sent SINGH multiple photographs of the face and upper body of a young, clothed female, who she was posing as. SINGH replied "I meant like fully body pics lol."

f. At approximately 2:05 a.m., SINGH then told Reporter-1 "I bet you'd wrap around my cock like a glove" and at 2:06 a.m., suggested "[m]aybe we can get a motel or something."

g. A few minutes later, SINGH asked Reporter-1, in a series of messages, if she had an "sc"³ or Instagram, and asked Reporter-1 to download WhatsApp, explaining he had "something you gotta watch live" and "I'm doing something rn and

² I know from my investigation that SINGH in fact was employed by the Westchester County Board of Legislators when he was communicating with Reporter-1 and thus worked for "the Government."

³ Based on my experience I understand "sc" to be a common abbreviation used for the mobile application Snapchat. I am aware that Snapchat is a mobile application that permits users to send messages and content to one another. One of the principal features of Snapchat is that pictures and messages are typically only available for a short time before they become inaccessible to their recipients.

I want you to watch." He then texted Reporter-1 "Daddy's ready to pop." A few minutes later, SINGH told Reporter-1 that she was "a couple years too young" and in response, Reporter-1 said "If you're interested, hit me up tomorrow." SINGH replied "ok I'll think about it."

h. Hours later, on or about the evening of December 13, 2022 at approximately 5:22 p.m., SINGH texted Reporter-1 "I'm prob not making it over tonight." At approximately 5:29 p.m., SINGH said to Reporter-1 "I can't stop thinking about how tight you are."

i. Between December 13 and December 15, 2022, SINGH and Reporter-1 continued to communicate via text message, including about SINGH planning to meet Reporter-1 in Newark, New Jersey, where Reporter-1 had stated that she lived.

j. On or about Thursday, December 15, 2022 at approximately 12:00 a.m., SINGH asked Reporter-1 what time her mom leaves and returns for work. Reporter-1 told SINGH that her mom works overnights and typically does not arrive back home from work until about 8:30 a.m. SINGH told Reporter-1 "weekends are honestly better bc of work." Reporter-1 replied "okay, so Friday?" and SINGH said "[t]hat is what I am thinking" and "I have plans right after work but once those are done I can swing by you." After they planned to meet, SINGH stated the following to Reporter-1, among other things, between approximately 12:22 a.m. and 1:17 a.m.: (1) "I can't wait to suck on your little perky tits"; (2) "I'm planning on putting as many loads in you as possible"; (3) "Either way you're getting fucked . . . Tomorrow or Friday"; and (4) "I can't wait to be inside of you."

k. SINGH also promised that he would bring to their meet-up Plan B birth control and various sex toys that "can fit in a bookbag." Specifically, SINGH identified the following sex toys: "a vibe, a massage gun dildo, restraints, a leather paddle, nipples clamps, silicone O rings and ball gags," as well as a "cock ring."

l. At approximately 11:01 a.m. on December 16, 2022, SINGH told Reporter-1 that he "called out for the morning" at work. Then, at approximately 5:17 p.m., SINGH stated to Reporter-1 that he was "grabbing drinks with a friend soon then coming over." Reporter-1 then texted SINGH that he should meet her at an address on Washington Avenue in Newark, New Jersey (the "Washington Avenue Address"), and suggested he park in the "parking lot right next to the front entrance." SINGH responded "[i]t will

take about an hour from where I am meeting up with my friend in Stamford CT so likely I'll be there closer to 10[.]”

m. At approximately 8:33 p.m., SINGH texted Reporter-1 “I’m coming no matter what tonight.” When Reporter-1 speculated that he was going to arrive late at night, SINGH responded “[e]ither way you’re getting dicked down hard tonight.” At approximately 9:11 p.m. SINGH texted Reporter-1 “I can’t wait to cum in you[.]”

n. At approximately 11:52 p.m., SINGH texted Reporter-1 “I’m comingggg.”

o. At approximately 12:45 a.m. and 12:46 a.m. on December 17, 2022, SINGH texted Reporter-1 “I’m in” and “I’m in the lobby,” respectively.

10. I am aware of the following based on my review of phone records for the 6874 Phone Number:

a. I am aware that ANAND SINGH, the defendant, is listed as the “customer” of the 6874 Phone Number. A different individual with the last name of SINGH (“Individual-1”)⁴ is listed as the subscriber.

b. The 6874 Phone Number and the Reporter-1 Phone Number exchanged hundreds of text messages and several phone calls, with their first communication on December 13, 2022 and their last communication on December 17, 2022.

c. Specifically, the 6874 Phone Number called the Reporter-1 Phone Number multiple times between on or about December 16, 2022 at 11:43 p.m. and December 17, 2022 at 12:47 a.m.

11. I have reviewed video footage provided to me by Reporter-2. In this video footage, I observed the following:

a. An individual who I have identified as ANAND SINGH is standing inside the lobby, near the elevators, of a building that appears to be the Washington Avenue Address in Newark, New Jersey based on my review of photos of the Washington Avenue Address. I am familiar with SINGH’s appearance based on my

⁴ Based my review of law enforcement database records and New York City Police Department records, I am aware that Individual-1 is a female born in 1955.

review of a photograph from SINGH's New York State criminal history employer background check report. SINGH is holding up a cell phone to his ear and carrying a backpack.

b. When approached by Reporter-2, SINGH exits the lobby. SINGH then walks to a gray Honda with the New York license plate number FFC 9483, which is parked in a parking lot next to the front entrance of the building, and quickly drives away from the area.

12. Based on my review of New York Police Department records and text message correspondence between ANAND SINGH, the defendant, and Reporter-1 on December 16 and 17, 2022, I am aware of the following:

a. At approximately 5:30 p.m. on December 16, 2022, SINGH texted Reporter-1 that he was meeting a friend in Stamford, Connecticut before traveling to Newark, NJ to meet Reporter-1.

b. At approximately 11:49 p.m. on December 16, 2022, SINGH texted Reporter-1 a screenshot of a mobile GPS application showing a vehicle located on I-95 South.

c. At approximately 12:14 a.m. on December 17, 2022, a 2011 Honda Accord with New York license plate number FFC 9483 registered to Individual-1 was captured on a license plate reader traveling southbound on the George Washington Bridge from New York to New Jersey. I am aware that the George Washington Bridge connects the Southern District of New York to New Jersey.

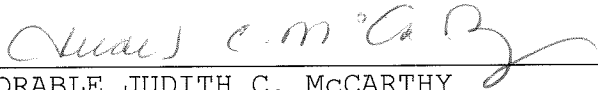
d. I am also aware that to travel from Stamford, Connecticut to Newark, New Jersey via the George Washington Bridge, SINGH traveled through Westchester County.

WHEREFORE, deponent prays that the above-named defendant be arrested and imprisoned or bailed as the case may be.



ERICA BUONOCORE
Special Agent
Federal Bureau of Investigation

Sworn to me this 1st day of ~~April~~^{May}, 2023



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