
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

GUY WEST

: Mag. No. 13-3003

:

: Hon. Patty Shwartz

:

: CRIMINAL COMPLAINT

ORIGINAL FILED
JAN - 7 2013
PATTY SHWARTZ
U.S. MAG. JUDGE

I, Kevin P. Matthews, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Kevin P. Matthews, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on January 7, 2013, at Newark, New Jersey



HONORABLE PATTY SHWARTZ
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

On or about December 18, 2012, in Hudson County, in the District of New Jersey, and elsewhere, defendant

GUY WEST

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), 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.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b)(1) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Kevin P. Matthews, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. At all times relevant to this Complaint, defendant GUY WEST was a permanent substitute teacher at a private school in Jersey City, New Jersey. In this position, he regularly taught and/or supervised children between the ages of 2 and 14.

The Investigation

2. On or about December 18, 2012, an FBI Special Agent working in an undercover capacity accessed a publicly available peer-to-peer ("P2P") network over the Internet and observed an individual using an assumed name and a certain Internet Protocol ("IP") address that was logged into the network. The investigation revealed that the username and IP address belonged to an individual, later identified as defendant WEST. According to the P2P network, defendant WEST was sharing more than 986 files.

3. The undercover agent browsed defendant WEST's shared folders and observed files depicting images of child pornography. Between 9:00 PM and 9:31 PM EST, the undercover agent downloaded from defendant WEST's folders approximately 120 image files and 24 video files, all of which depicted child pornography. Three of the files downloaded by the undercover agent from defendant WEST had filenames and descriptions as follows:

IMAGE	FILENAME	DESCRIPTION
1	BoyFuck Magazine -- 2006-01 -- preteen boy man child porn	This image appears to depict a magazine cover. There are two images on the cover. The first image appears to depict a naked, prepubescent, Caucasian boy leaning over an object with his left leg in the air exposing his genitals and buttocks to the viewer of the image. The words "Seven-year-old Maarten shows off his most private parts to our photographer -- and you! Lots of close-ups of his boydick and hairless little nutsack inside!!! MAN-BOY CHILD PORN SPECTACTULAR!" are written on the boys buttocks. The words "PLUS: 5-year-olds jacking 6-year-olds getting fondled 7-year-olds sucking mancock 8-year-olds fucking each other

IMAGE	FILENAME	DESCRIPTION
		<p>9-year-olds getting plugged ... and much more!” are written on the boys right thigh. The second image appears to depict a prepubescent Caucasian boy lying down. He is visible and naked from his stomach to his upper thighs. His genitals are exposed to the viewer of the image. His hands are on his stomach and near his genitals. An adult male is in front of the boy and his erect penis is inserted into the anus of the boy. The image is taken from the point of view of the adult male looking down on the boy. The words “Ahhhhh! Fucking a ten-year-old up the ass is one of the greatest pleasures in life! Turn to page 48 to see Bryan taking it as deep as he can!” are written on the second image. The words “BOYFUCK FOR MEN WHO ENJOY SEX WITH KIDS” are written at the top of the cover. “ISSUE # 13 – January 2006” are also written near the top of the cover.</p>
2	YboyR_040	<p>This image appears to depict a Caucasian, naked, prepubescent boy with brown hair sitting on a chair which is covered by a white towel. White rope is around the boy’s left shoulder, left wrist, left knee, right knee and left wrist causing him to be tied to the chair. A Caucasian adult male is standing near the boy’s right shoulder. The adult’s erect penis is inserted in the boy’s mouth. The image is taken from the point of view of the adult male looking down on the boy. The boy’s genitals are exposed to the viewer of the image.</p>
3	Trevor 03Nov22_02	<p>This image appears to depict a naked, prepubescent boy lying on a red blanket. He is visible from his chest to his knees. There is a blue and tan desk in the background with red, white and blue ribbons containing medals hanging on the top of the desk. A Caucasian, adult male, with short brown hair, a goatee and a tattoo on his right shoulder is visible from his head to his shoulders. The adult male is propped up on his elbows over the boy’s genital area with his hands under the sides of the boy’s buttocks. The adult male is licking the tip of the boy’s penis with his tongue.</p>

4. On January 7, 2013, law enforcement officers executed a search warrant at defendant WEST’s residence in Jersey City, New Jersey (the “residence”). At the residence, law enforcement discovered computer equipment belonging to defendant WEST, including an external hard drive connected to a laptop computer with the P2P program installed on it. Among the files law enforcement found on the hard drive belonging to defendant WEST were a vast

number of images of child pornography, as defined by Title 18, United States Code, Section 2256(8), including material that involved prepubescent minors as well as material that portrays sadistic or masochistic conduct. The files described above, which were downloaded from defendant WEST on December 18, 2012, were also contained on the external hard drive connected to defendant WEST's laptop.

5. During and after the search of the residence, and after being advised of his Miranda rights, defendant WEST admitted to law enforcement officers, among other things, in substance and in part, that: (1) he has a large library of child pornography which he estimated to include more than 100,000 images and videos; (2) he masturbates to images of child pornography multiple times a day; and (3) he is sexually aroused by young boys of all ages, including infants.

6. Defendant WEST also was shown a printout of his profile page on the P2P network. He acknowledged that he was the sole user of the P2P network account. He also admitted that (1) he shares pornographic images of children with other people via the aforementioned P2P network; and (2) the electronic devices on which the above images were found belong to him.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images described in paragraph 3 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet, based upon, among other things, their presence on defendant WEST's external hard drive and law enforcement's knowledge that defendant WEST had shared these images on an internet-based P2P network.