

KTF:BET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 2251(a))

MICHAEL JAFFERAKOS,

No. 25-MJ-283

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

RACHEL M. KIDD, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

In or about and between July 2024 and September 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL JAFFERAKOS did knowingly and intentionally employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a))

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

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been for approximately two years. I am assigned to HSI's Child Exploitation Investigations Team in New York. During my tenure with HSI, I have participated in the investigation of cases involving crimes against children. Specifically, I have experience investigating cases involving the sexual exploitation of minors and the production, receipt, distribution, and possession of child pornography, also referred to as child sexual abuse material ("CSAM").² I have conducted physical surveillance, executed search warrants, reviewed and analyzed electronic devices, and interviewed suspects and witnesses. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in child exploitation crimes to conceal their actions from detection by law enforcement.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

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.

² The term "child pornography" is defined as set forth in 18 U.S.C. § 2256(8), which, in pertinent part, states that "any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where . . . the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct. . . ." 18 U.S.C. § 2256(8); see also *Ashcroft v. Free Speech Coalition*, 535 U.S. 234 (2002) (analyzing constitutional validity of the definitions set forth in 18 U.S.C. § 2256(8)).

3. As described below, there is probable cause to believe that the defendant MICHAEL JAFFERAKOS has engaged in the production of child sexual abuse material on the internet with multiple minor victims, including at least one minor boy who plays on a basketball team that JAFFERAKOS has coached in Brooklyn, New York.

I. Minor Victim 1

4. On or about September 23, 2025, the Honorable Marcia M. Henry, United States Magistrate Judge for the Eastern District of New York, signed a warrant to search the defendant MICHAEL JAFFERAKOS's house (the "Warrant"), which is located in Brooklyn (the "SUBJECT PREMISES").

5. On or about September 25, 2025—i.e., this morning—I, along with other members of HSI, executed the Warrant. The defendant MICHAEL JAFFERAKOS was present at the time the Warrant was executed. At least nine electronic devices within JAFFERAKOS's possession were seized pursuant to the Warrant, and a preliminary search of some of those devices revealed the presence of hundreds of images and videos containing child sexual abuse material on at least one of those devices (JAFFERAKOS's iPhone), many of which JAFFERAKOS shared to a Telegram group with several other Telegram users, including the Telegram user "a Tony." The review of those devices pursuant to the Warrant remains ongoing.

6. I interviewed the defendant MICHAEL JAFFERAKOS outside the SUBJECT PREMISES while other officers executed the Warrant.³ After waiving his Miranda rights, JAFFERAKOS admitted, in sum and substance, to instructing and paying multiple minor

³ After this initial interview, I also interviewed the defendant MICHAEL JAFFERAKOS at HSI's office in Manhattan. During this second interview, I re-Mirandized JAFFERAKOS and asked him additional questions about his involvement in the production of child sexual abuse material.

victims to produce child sexual abuse material over the course of the last few years.

JAFFERAKOS said that he instructed and paid these minor victims for child sexual abuse material primarily on behalf of the Telegram user “a Tony,” whose name is “Anthony.” Based on a review of JAFFERAKOS’s iPhone, “Anthony” has sent JAFFERAKOS hundreds of dollars via Zelle over approximately the last year. During his interview, JAFFERAKOS admitted that “Anthony” made these payments to JAFFERAKOS in exchange for JAFFERAKOS’s production of child sexual abuse material with minor children.

7. During his interview, the defendant MICHAEL JAFFERAKOS described instructing and paying a 14-year-old boy (“Minor Victim 1”) for videos depicting Minor Victim 1 engaging in sexually explicit conduct as recently as this week (the week of September 22, 2025). JAFFERAKOS knows Minor Victim 1 through JAFFERAKOS’s work for a youth basketball program run by a Catholic church in Brooklyn. JAFFERAKOS has been involved with the basketball program since around 2017, initially as a coach and currently as a commissioner for the program. With respect to Minor Victim 1, JAFFERAKOS said that “Anthony” saw Minor Victim 1 on the basketball program’s Instagram account and asked JAFFERAKOS to approach Minor Victim 1 to produce child sexual abuse material. JAFFERAKOS said that Anthony agreed to pay Minor Victim 1 directly for such material by purchasing him an electronic bicycle.

8. During a review of the defendant MICHAEL JAFFERAKOS’s iPhone, I identified at least two videos of Minor Victim 1 engaging in sexually explicit conduct, which were air-dropped from Minor Victim 1 to JAFFERAKOS on or about September 22, 2025 at approximately 9 p.m. These videos included an approximately 10 second video of Minor Victim 1 masturbating, and an approximately 42 second video of Minor Victim 1 taking his

clothes off and displaying his genitals. During his interview, JAFFERAKOS admitted to instructing Minor Victim 1 to create these videos on behalf of “Anthony.”

9. During the review of the defendant MICHAEL JAFFERAKOS’s iPhone, I also identified an approximately 16-minute video of JAFFERAKOS giving Minor Victim 1 a massage while Minor Victim 1 was wearing boxers and no other clothing. Based on the metadata from the video and my interview with JAFFERAKOS, I understand that Minor Victim 1 and JAFFERAKOS filmed this video together on or about September 22, 2025 in the basement of the church building where JAFFERAKOS works, and I believe based on the evidence to date that Minor Victim 1 air-dropped the videos of himself engaging in sexually explicit conduct described above during this in-person interaction with JAFFERAKOS.

II. Minor Victim 2

10. On or about September 19, 2024, the police in Oconomowoc County, Wisconsin responded to a 911 call made by the mother of a 14-year-old boy (“Minor Victim 2”). The mother of Minor Victim 2 told police she observed a sexually explicit video of Minor Victim 2 on his cell phone and saw that Minor Victim 2 had sent the video to an individual with a phone number that is subscribed to the defendant MICHAEL JAFFERAKOS at the SUBJECT PREMISES. When the police spoke with Minor Victim 2, he said that he met JAFFERAKOS on Snapchat, and that JAFFERAKOS told Minor Victim 2 he lived in New York City and offered to fly Minor Victim 1 to New York City.

11. On or about October 3, 2024, law enforcement officers reviewed Minor Victim 2’s cell phone. During the review, the officers saw that Minor Victim 2 sent three videos to the defendant MICHAEL JAFFERAKOS in or about August 2024, all of which

showed Minor Victim 2 engaging in sexually explicit conduct. These three videos are described below:

a. The first video, four minutes and four seconds in length, depicted Minor Victim 2 wearing a white t-shirt, black shorts, and black Hanes underwear. Minor Victim 2 proceeded to undress himself while masturbating. Minor Victim 2 then laid down on the bathroom floor and continued to masturbate.

b. The second video, two minutes and thirty-eight seconds in length, depicted Minor Victim 2 masturbating while laying down on the bathroom floor.

c. The third video, one minute and thirty-seven seconds in length, depicted Minor Victim 2 laying down on the bathroom floor and masturbating. After ejaculating, Minor Victim 1 proceeded to put his black shorts and a white t-shirt back on.

12. During the review of Minor Victim 2's cell phone, the Oconomowoc Police Department also observed that the defendant MICHAEL JAFFERAKOS made multiple payments to Minor Victim 2 using Apple Pay. In or about November 2024, the Oconomowoc Police Department received records from Green Dot Corporation, a payment platform used to facilitate cash payments between individuals using Apple Pay. The Green Dot Corporation records showed that JAFFERAKOS made approximately 15 payments to Minor Victim 2 from in or about July 28, 2024 to in or about September 8, 2024.

13. On or about September 25, 2025, when I interviewed the defendant MICHAEL JAFFERAKOS at the SUBJECT PREMISES, JAFFERAKOS admitted to instructing Minor Victim 2 to create the child sexual abuse material described above. JAFFERAKOS also admitted to paying Minor Victim 2 for such material. Similar to the conduct relating to Minor

Victim 1 described above, JAFFERAKOS told law enforcement that he paid Minor Victim 2 for the material on behalf of "Anthony."

WHEREFORE, your deponent respectfully requests that an arrest warrant issue so that the defendant MICHAEL JAFFERAKOS can be dealt with according to law.



RACHEL M. KIDD
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
25th day of September, 2025



THE HONORABLE SETH M. EICHENHOLTZ
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK