

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

MATTHEW WILLIAM JOSEPH ENHOFFER)

Case No.)

8:19MJ2227TGW

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/17/2018 and 9/11/2019 in the county of Pinellas in the Middle District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2252(a)(2),(b1) and (a)(4)(B), (b)(2)	Receipt and distribution of child pornography and possession of child pornography

This criminal complaint is based on these facts:

See Attached Affidavit.

Continued on the attached sheet.

Tara Towe
Complainant's signature

Tara Towe, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: September 17, 2019

Thomas G. Wilson
Judge's signature

City and state: Tampa, Florida

THOMAS G. WILSON, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Tara Towe, a Special Agent with Homeland Security Investigations, being duly sworn, state as follows:

1. I am a Special Agent with the United States Homeland Security Investigations (HSI) and have been so employed since 2008. I am currently assigned to the HSI, Special Agent in Charge (SAC) Tampa, Florida. I have investigated matters involving the online exploitation of children, particularly in relation to violations of 18 U.S.C. §§ 2251, 2252 and 2252A, which criminalize the production, possession, receipt, and transmission of child pornography. I have assisted with arrests and conducted searches pertaining to these types of investigations.

2. As a Special Agent, I am authorized to investigate violations of the laws of the United States and to execute arrest and search warrants issued under the authority of the United States. I have participated in numerous investigations involving child pornography.

3. This affidavit is being submitted in support of an application for an arrest warrant for Matthew William Joseph Enhoffer (“**ENHOFFER**”). This affidavit does not set forth every fact resulting from the investigation; rather, it sets forth facts sufficient to establish probable cause to believe that **ENHOFFER** committed violations of 18 U.S.C. §§ 2252(a)(2) and (b)(1) (receipt and distribution of child pornography), and (a)(4)(B) and (b)(2) (possession of child pornography). I am requesting that the Court issue an arrest warrant for **ENHOFFER** based upon

the following information that I have learned in my official capacity, by firsthand observations, as well as by receiving information from federal and local law enforcement in reference to this investigation.

PROBABLE CAUSE

4. This investigation began on or about July 18, 2019, when a web-based social media application (“Application A”) submitted CyberTipline Report 52400621 to the NCMEC CyberTipline. This report was the result of two suspected child exploitation images, which traveled in interstate commerce, that were uploaded to Application A from a specific username.

5. According to CyberTipline Report 52400621, username “thehoff727” uploaded two suspected child pornographic images on or about July 18, 2019 from IP address 65.32.225.117, which is registered to Charter Communications.

Application A also included the following subscriber information for username “thehoff727” in its report:

Phone: +1-973-XXX-0239
Date of Birth: XX-XX-1985¹
Email Address: matthew.enhoffer@gmail.com
IP Address: 65.32.225.117 (5/11/2019 at 08:38:23 UTC)

6. Pursuant to an HSI summons, on or about August 27, 2019, Charter Communications provided the following information for IP address: 65.32.225.117:

Length of Service: Active since 10/12/2015
Subscriber Name: Matthew Enhoffer
Account Address: A residence located on 87th Avenue North, St. Petersburg, FL

¹ This is the same date of birth listed on ENHOFFER’s Florida driver’s license.

Daytime TN: 973-XXX-0239²
Email: MEnhoffer2@tambabay.rr.com
Account Number: 510481602
Original Lease Start: 7/18/2018 at 5:44:33 AM
Lease End: 8/28/2019 at 1:10:10 AM

7. On or about September 7, 2019, I reviewed the images that Application A submitted to NCMEC in CyberTipline Report 52400621, which are described as follows:

a. An image with file name “eaa4670b-74c1-4413-9f39-4e173659002d_CHAT_MEDIA_1550461112984.jpeg.” The image depicts a prepubescent female child, approximately seven to nine years old, naked on a bed with the child’s legs spread apart. An adult’s index finger is touching the child’s vagina. Based on my training and experience, the image constitutes child pornography, as defined by 18 U.S.C. § 2256.

b. An image with file name “eaa4670b-74c1-4413-9f39-4e173659002d_CHAT_MEDIA_1550460910564.jpeg.” The image depicts a prepubescent female child, approximately five to seven years old, laying on the bed naked from the waist up. An adult male appears to be straddling the child while the child holds the adult male’s erect penis. The female child’s eyes are closed and semen appears to be covering the child’s face. Based on my training and experience, the image constitutes child pornography, as defined by 18 U.S.C. § 2256.

² This is the same phone number associated with the “thehoff727” Application A subscriber information.

8. On or about September 11, 2019, I obtained a federal search warrant for **ENHOFFER's** residence, which is located within the Middle District of Florida, and HSI agents executed the warrant on that same date.

9. During the search of **ENHOFFER's** residence, HSI agents located and seized an Apple MacBook Air. During a forensic examination of the MacBook Air with the username, "matther enhoffer," forensic analysts found the following child pornographic images:

a. An image with file name "Photo Nov 27, 09 11 28." The image depicts a prepubescent female child, approximately four to six years old, in a red tank top, laying on her back with her arms bound above her head by rope. An adult male appears to be straddling the child. The female child has an adult male's erect penis penetrating her mouth. Based on my training and experience, the image constitutes child pornography, as defined by 18 U.S.C. § 2256.

b. An image with file name, "download (7)." This image is a compilation of six images of a prepubescent female child who is approximately four to six year old. Based on my training and experience, the images constitute child pornography, as defined by 18 U.S.C. § 2256. The images are described as follows:

- i) In the first image of the compilation, the female child is laying on her back, shirtless, with her pink pants pulled down to her knees. The child's genitals are exposed.
- ii) In the second image of the compilation, the female child is laying on her back, nude, with her legs spread exposing her genitals.

- iii) In the third image of the compilation, the female child is nude, sitting on a bed next to an adult male. The adult male is nude, has an erect penis, and has his arms around the child.
- iv) In the fourth image of the compilation, an adult male is straddling the female child. The adult male's erect penis is on the chin of the female child.
- v) In the fifth image of the compilation, the female child is nude, lying face down, on a bed. An adult male's erect penis is resting on the female child's buttocks.
- vi) In the sixth image of the compilation, the female child is nude, lying on her back with her hands over her face. An adult male's penis is penetrating the child's vagina.

c. An image with file name, "Asian Facial." This image is identical to the image submitted by Application A to the CyberTipline Report 52400621, titled "eaa4670b-74c1-4413-9f39-4e173659002d_CHAT_MEDIA_1550460910564.jpeg."

10. Additionally, during the forensic examination of the abovementioned MacBook Air with the username, "matther enhoffer," forensic analysts found the following iMessage archived messages between matthew.enhoffer@gmail.com and phone number (775) XXX-6699:

a. On or about July 17, 2018, the user of phone number (775) XXX-6699 sent **ENHOFFER** an iMessage asking; "What doing." **ENHOFFER** replied with a child pornographic image. The image depicts a prepubescent female child,

approximately four to six years old kneeling, naked on the floor. Semen appears to be covering the child's hair, face, chest and stomach. Based on my training and experience, the image constitutes child pornography, as defined by 18 U.S.C. § 2256. The user of phone number (775) XXX- 6699 replied to **ENHOFFER**, "Mmm that's new."

b. On the same day, **ENHOFFER** sent the user of phone number (775) XXX- 6699 two child pornographic images. The first image depicts two prepubescent children, approximately four to six years old, simultaneously performing oral sex on each other. An adult female is kneeling behind the children holding a metal chain. The adult female's right hand is resting on the back of one of the children. The second image depicts a prepubescent female child, approximately four to six years old, laying naked on a bed with her legs spread apart, exposing her genitals. A naked, adult female is lying next to the female child. The adult female's hand is on the female's child's vagina. A second adult female's hand is near the child's mouth. Based on my training and experience, these images constitute child pornography, as defined by 18 U.S.C. § 2256. The user of phone number (775) XXX- 6699 replied to **ENHOFFER**, "Fuck, Do u play to these."


c. On the same day, **ENHOFFER** replied with a child pornographic image. The image depicts a prepubescent female, approximately four to six years old, laying on her back with her mouth covered with tape. The female child's wrists are bound together with tape. The female child's legs are bent at the

knee and taped in a way to prevent the child's leg from being able to become straight. A rope or cord was used to keep the female child's legs spread apart exposing her genitals. **ENHOFFER** then replied, "No, usually I play to you tbh." Based on my training and experience, the image constitutes child pornography, as defined by 18 U.S.C. § 2256. The user of phone number (775) XXX- 6699 replied to **ENHOFFER**, "Mmmmmm."

d. On the same day, the user of phone number (775) XXX- 6699 sent **ENHOFFER** an iMessage stating; "I came." **ENHOFFER** replied, "Mmm kitten. Make daddy cum." The user of phone number (775) XXX-6699 asked, "Can we do that to two lil ones. Make one of them eat the other." **ENHOFFER** responded, "Hehehe of course ;). Make daddy cum telling me stories about you getting pounded. Hehehe."


CONCLUSION

11. Based on the foregoing facts, there is probable cause to believe that ENHOFFER committed violations of 18 U.S.C. §§ 2252(a)(2) and (b)(1) (receipt and distribution of child pornography), and (a)(4)(B) and (b)(2) (possession of child pornography).



Tara Towe, Special Agent
Homeland Security Investigations

Sworn to and subscribed before me
This 17th day of September 2019.



THOMAS G. WILSON
United States Magistrate Judge