

ORIGINAL

Approved: Alexander Li
ALEXANDER LI
Assistant United States Attorney

Before: THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

19MAG 4952

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violations of 18
PETER BRIGHT,	:	U.S.C. §§ 2422(b) and
Defendant.	:	2
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SOUTHERN DISTRICT OF NEW YORK, ss.:

ELIZABETH JENSEN, 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 to Engage in Illegal Sexual Activity)

1. From on or about April 18, 2019 up to and including on or about May 22, 2019, in the Southern District of New York and elsewhere, PETER BRIGHT, the defendant, willfully and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, BRIGHT used computers and/or telephones to communicate with an undercover FBI agent about arranging to engage in sexual activity with a purported nine-year old boy and a seven-year old girl, and attempted to meet with the boy and the girl to engage in sexual activity, in violation of New York Penal Law Sections 130.25(2), 130.30(1), 130.35(3), 130.55, 130.60(2), and 130.65(3) and (4).

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

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

2. I am a Special Agent with the FBI and have been so employed for approximately four and a half years. I am assigned to an FBI squad charged with enforcing federal laws prohibiting child pornography and other forms of child exploitation. As such, I have worked on numerous investigations and prosecutions involving minor victims and the adults who victimize these children. This affidavit is based upon my personal participation in the investigation of this matter, as well as on my conversations with other law enforcement officers and my examination of documents, reports, and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of communications exchanged between an FBI agent acting in an undercover capacity ("UC-1") and an individual later identified as PETER BRIGHT, the defendant, I have learned, among other things, the following:

a. On or about April 17, 2019, UC-1 posing as a mother of a nine-year old boy (the "Boy") and seven-year old girl (the "Girl," and together with the Boy, the "Minors") posted a public message on an online social media fetish platform called KinkD seeking to chat with people who are, in sum and substance, interested in teaching her children lessons about the "birds and the bees."

b. On or about April 18, 2019, a KinkD user by the handle "randomanon," later identified as PETER BRIGHT, the defendant, responded to UC-1's KinkD post.

c. On or about May 1, 2019, UC-1 replied to BRIGHT on KinkD, "My princess is 7 and my Prince Charming is 9." BRIGHT suggested moving the conversation to text messaging.

d. On or about May 14, 2019, BRIGHT and UC-1 decided to continue their conversation over WhatsApp, a messaging application for cellphones. In order to communicate using

WhatsApp, BRIGHT provided UC-1 with a particular cellphone number linked to his WhatsApp account (the "Telephone Number").

e. Between on or about May 14, 2019 and on or about May 22, 2019, BRIGHT engaged UC-1 in discussions regarding BRIGHT's ongoing sexual experience with an 11-year old girl, the Minors' previous sexual experience, and the possibility of BRIGHT meeting UC-1 and the Minors in person in Manhattan, New York, to engage in sexual activity, including BRIGHT penetrating the Girl with a finger, a toy, or his penis. The following are excerpts from the exchange between UC-1 and BRIGHT on WhatsApp:

UC-1: When you last teach a little girl ?
UC-1: I don't want just anyone teaching them
BRIGHT: I have a girl I've been teaching off
and on for a couple of months now. But
she's in the Bronx, which makes the
logistics much harder.
UC-1: As old as my princess?
BRIGHT: A bit older, 11.
UC-1: Ahh ok... a little bit
UC-1: What are you good at teaching ?
UC-1: We have started the basics with [the
Girl]
BRIGHT: I think masturbation and anal sex are
probably my favourite subjects.
BRIGHT: Helping girls find those special places
to touch, it's very rewarding.

UC-1: You thought about what kind of lesson
you would like to start with?
UC-1: Anything excite you :) ?
BRIGHT: Really depends on their experience, but
I'm thinking maybe something involving
foreskin is the way to start.

BRIGHT: Do you want the lessons to be
heteronormative?
UC-1: Sorry for my ignorance. What do you
mean by that ?
UC-1: As opposed to what ?
BRIGHT: Does [the Girl] eat flowers and [the
Boy] suck snakes?

UC-1: I'm wondering how you teach her how to pleasure herself and you?
BRIGHT: Some girls at a very early age discover that it feels good to rub certain bits
BRIGHT: But otherwise, help her discover that herself, touching or vibrating her clit, putting a finger inside, or maybe a very tiny toy
BRIGHT: How to hold my snake, showing her where the most sensitive parts of it are, the parts that feel best to lick or rub
BRIGHT: How to take it in her hand and the kinds of motion that feel good
UC-1: Yes helping her discover all the best parts are super important and can be tricky to master.
BRIGHT: Yes, gentle touching and teasing
BRIGHT: Is [the Girl] a virgin?
UC-1: She has had the tip inside but not the whole cock
BRIGHT: Ok.
UC-1: Does that excite you lol?
BRIGHT: Yes. But I think the tip might be all I can manage

Based on my review of the text conversation between BRIGHT and UC-1, I understand "snake" to refer to a penis and "flower" to refer to a vagina.

f. On or about May 15, 2019, BRIGHT sent UC-1 two photographs documenting his test results for several sexually transmitted infections, including HIV, hepatitis B, hepatitis C, and gonorrhea.

g. On or about May 16, 2019, BRIGHT sent UC-1 two photographs of himself (the "Photographs"). Based on my visual inspection, one of the Photographs appears to be identical to the profile pictures associated with BRIGHT's WhatsApp account and BRIGHT's KinkD account.

h. On or about May 17, 2019, during a recorded telephone call between UC-1 and BRIGHT, BRIGHT stated that he was available to meet on Monday, May 20, 2019. UC-1 and BRIGHT discussed the "first lesson" and BRIGHT explained that he would

want to meet the Minors, have them introduce themselves, have them show him what they already know, and teach them about the foreskin on his penis.

i. On or about May 19, 2019, BRIGHT sent UC-1 a photograph of his penis.

j. On or about May 20, 2019, BRIGHT and UC-1 rescheduled their meeting to Wednesday, May 22, 2019.

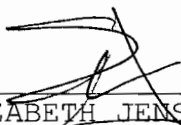
4. Based on my review of records from T-Mobile US, I learned that the "Customer Name" associated with the Telephone Number is PETER BRIGHT, the defendant.¹

5. On or about May 22, 2019, PETER BRIGHT, the defendant, met UC-1 on or about Hudson Street, in Manhattan, New York, and was arrested shortly thereafter. Based on my visual inspection, PETER BRIGHT, the defendant, is the same person as the individual in the Photographs.

6. PETER BRIGHT, the defendant, was thereafter advised of his *Miranda* rights, waived those rights, and agreed to speak with law enforcement officers. Among other things, BRIGHT admitted to having chatted with UC-1 regarding engaging in sexual activity with the Minors.

¹ The "Subscriber Name" associated with the Telephone Number is another individual with the surname BRIGHT.

WHEREFORE, the deponent respectfully requests that PETER BRIGHT, the defendant, be imprisoned, or bailed, as the case may be.



ELIZABETH JENSEN
Special Agent
Federal Bureau of Investigation

Sworn to before me this
23rd day of May, 2019



THE HONORABLE DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK