

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America

v.

Case No. 1:21-MJ-109PAS

James Ward Jackson (YOB: 1955)

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 October 30, 2021 in the county of _____ in the
 _____ District of Rhode Island, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252(a)(4)(B):

Possession of Child Pornography; and

18 U.S.C. § 2252(a)(2):

Distribution of child pornography.

This criminal complaint is based on these facts:

See the attached Affidavit of Special Agent James V. Richardson, Homeland Security Investigations ("HSI").

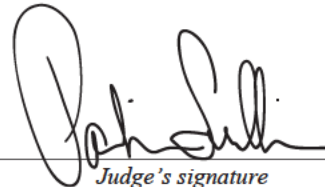
☒ Continued on the attached sheet.

 James V. Richardson
 Special Agent
 Homeland Security
Complainant's signature

Special Agent James V. Richardson ~ HSI

Printed name and title

Sworn telephonically and signed electronically

~~Sworn to before me and signed in my presence.~~Date: November 1, 2021City and state: Providence, Rhode Island

Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT

I, James V. Richardson, a Special Agent (SA) with Homeland Security Investigations, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI") since 2009 and am currently assigned to the office of the Resident Agent in Charge (RAC), Providence, RI. While employed by HSI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training at the Federal Law Enforcement Training Center in Brunswick, GA, and as a member of the Rhode Island Internet Crimes Against Children (ICAC) Task Force conducting these types of investigations. I have investigated child pornography cases and related sexual offenses on a full-time basis since approximately January 2010. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have conducted and assisted in conducting numerous investigations into the violation of both state and federal laws relating to the possession, receipt, transportation, distribution, and production of child pornography and obscene visual representations of the sexual abuse of children over the Internet. I have reviewed hundreds of images and videos of actual and suspected child pornography, child

erotica, and obscene visual representations of the sexual abuse of children. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252 and 2252A, and I am authorized by law to request a search warrant.

2. This affidavit is submitted in support of an application for a criminal complaint charging JAMES W. JACKSON, (D.O.B. xx/xx/1955) ("JACKSON") with distributing child pornography in violation of 18 U.S.C. 2252(a)(2) and possessing and accessing with intent to view child pornography in violation of 18 U.S.C. 2252(a)(4).

3. On September 4, 2021, East Providence Police Department (EPPD) and Internet Crimes Against Children (ICAC) Task Force member Detective Corporal Stephen Evans identified a computer or other device utilizing Internet Protocol (IP) address 72.82.21.56 sharing files of child sexual abuse material (CSAM) using a peer-to-peer file-sharing network¹. Detective Corporal Evans viewed a portion of the aforementioned files and confirmed several of the video files content to be CSAM. One of the files is described below:

File Name: Wanted Dad And Daughter-1

Description: This video is two minutes, and thirty-two seconds of a nude prepubescent female [REDACTED].

¹ peer-to-peer networks are designed to facilitate the sharing of electronic files between participating members over the Internet. To become a member of a peer-to-peer network, a computer user installs file-sharing software on a computer which creates a "sharing folder", into which may be placed any electronic files available for other members on the network to copy. The user also gains the ability to copy any electronic files into his/her "sharing folder" from other network members. A single peer-to-peer network may consist of thousands of interconnected computers, and the electronic files available on that network are all stored on the individual members' computers rather than on a central host computer.

4. Detective Corporal Evans conducted an inquiry with the American Registry of Internet Numbers (ARIN) and determined that the owner of IP address 72.82.21.56 is Verizon Fios, 180 Washington Valley Road, Bedminster, NJ, 07921. The IP address was geolocated to the Providence area of Rhode Island. Geolocation is the process of approximating the location of a computer or other device connected to the internet based on its IP address. Detective Corporal Evans sent legal process to Verizon for the subscriber of 72.82.21.56 on September 4, 2021 at 11:11:59 (UTC). Verizon responded to the legal process and identified the subscriber as St. Mary's Church of Providence, 538 Broadway, Floor 1, Providence, Rhode Island 02909.

5. Detective Corporal Evans observed a computer or other device using Internet Protocol (IP) address 72.82.21.56 was on a peer-to-peer file-sharing network on Sunday, September 26, 2021 at 5:32PM, Friday October 15, 2021 at 3:12PM, and Sunday, October 17, 2021 3:58PM. The connection on October 15, 2021, revealed nine additional files of CSAM. Detective Corporal Evans viewed a portion of the aforementioned files and confirmed several of the video files content to be consistent with CSAM. One of the files is described below:

File Name: 000007.mp4

Description: This video is thirty-three minutes and thirteen seconds long.

The video is of a nude pubescent female [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

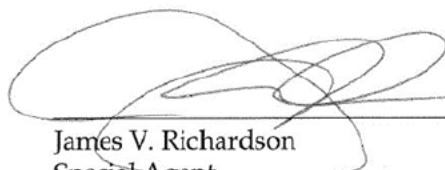
[REDACTED]

6. On October 30, 2021, Detective Corporal Evans and other members of the ICAC Task Force executed a state authorized search warrant at St. Mary's Church of Providence, 538 Broadway, Providence, Rhode Island 02909 to include exterior buildings on the property to include the detached yellow building commonly known as the rectory. ICAC Task Force members encountered a Catholic priest names JAMES W. JACKSON outside of the rectory building. Detective Corporal Evans and another ICAC Task Force member spoke to JACKSON inside the rectory in a dining room/common area while other members searched two rooms occupied by JACKSON inside the rectory. JACKSON was given his Miranda rights and asked to speak with an attorney after learning that detectives were there to investigate offenses related to child pornography.

7. RISP Forensic Analyst (FA) Gerald Gent conducted an on-scene forensic preview of JACKSON's 2 terabyte Western Digital easystore external hard drive (Serial Number WXG1EC99L2ZH) located in JACKSON's office area of the rectory which adjoined JACKSON's bedroom. As a result of the preview, FA Gent observed hundreds of image and video files depicting CSAM. These image and video files depicted prepubescent females, including infants and toddlers, engaged in sexual acts, to include bondage and bestiality, and/or the graphic and lascivious exhibition of their genitals. One particular video file, Jenny Suck Dog [REDACTED] And Loving It.avi, was in the folder

\KD Mov\Jenny\ and depicts a nude prepubescent female repeatedly inserting [REDACTED]

8. Based on the above, I believe there is probable cause to arrest JAMES W. JACKSON for knowingly distributing child pornography in violation of 18 U.S.C. 2252(a)(2); and possessing and accessing with intent to view child pornography in violation of 18 U.S.C. 2252(a)(4).


James V. Richardson
Special Agent
Homeland Security

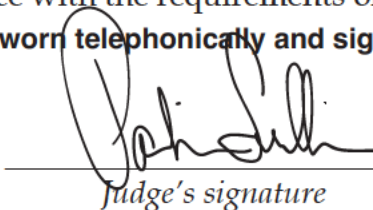
Attested to by the applicant in accordance with the requirements of Fed.

R. Crim. P. 4.1 by telephone. **Sworn telephonically and signed electronically**

November 1, 2021

Date

Providence, Rhode Island
City and State


Judge's signature

Patricia A. Sullivan, U.S. Magistrate Judge
Printed name and title

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☐ INDICTMENT ☒ COMPLAINT

CASE NO. 1:21-MJ-109PAS

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM RICHARD B. MYRUS
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000Name of Asst.
U.S. Attorney John P. McAdams
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
HSI ~ James V. Richardson, Special Agent☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☐ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.Place of
offense RHODE ISLAND

County

USA vs.

Defendant: James Ward Jackson

Address:

☐ Interpreter Required Dialect: _____Birth
Date 1955☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number

DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date 10/30/2021 or Date Transferred to Federal Custody

☐ Currently in Federal Custody☒ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. § 2252(a)(4)(B)	Possession of Child Pornography	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 20 years/ Fine: \$250,000	Supervised Release: 3 yrs-Life/Sp Asst: \$100 & \$5,000	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 2252(a)(2)	Distribution of child pornography	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	Imprisonment: 5-40 years/ Fine: \$250,000	Supervised Release: Life/ Special Asst: \$100 & \$5,000	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 3	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor