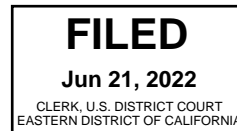


UNITED STATES DISTRICT COURT

for the
Eastern District of California



United States of America
v.

JORDAN T. PIPER

Case No. 2:22-mj-0097 CKD

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 3, 2019 to January 9, 2020 in the county of Tuolumne and El Dorado in the
Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a)	Sexual Exploitation of a Child

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/

Complainant's signature

Scott Schofield, Special Agent, FBI

Printed name and title

Sworn to before me telephonically.

Date: June 21, 2022

Judge's signature

City and state: Sacramento, California

Carolyn K. Delaney, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST
WARRANT**

I, Scott A. Schofield, do swear and affirm as follows:

I. INTRODUCTION AND PURPOSE FOR AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Jordan T. PIPER for Sexual Exploitation of a Child, in violation of 18 U.S.C. § 2251(a). The statements contained in this affidavit are based on my experience and training as a Special Agent of the Federal Bureau of Investigation and the information provided to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that PIPER violated Title 18, United States Code § 2251(a), Sexual Exploitation of a Child.

II. AGENT BACKGROUND

2. I have been employed as an FBI Special Agent since 2004, and am currently assigned to the Violent Crimes Against Children Squad in the Sacramento Division. While employed by the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography, also known as visual depictions of minors engaging in sexually explicit conduct or child sexual abuse material (CSAM). I have received training in the area of identifying and investigating CSAM and child exploitation crimes, and as part of my duties have observed and reviewed numerous examples of CSAM in all forms of media, including computer media. In the course of my employment, I have participated in hundreds of investigations in connection with child exploitation matters. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b), and I am authorized by the Attorney General to swear out criminal complaints and arrest suspects who have committed federal crimes.

III. FACTS ESTABLISHING PROBABLE CAUSE

Child Abuse Investigation

3. I am aware of the following facts from reviewing reports from the El Dorado County Sheriff's Office (EDCSO), the Placerville Police Department, and from personally viewing the videos and screen capture images described herein.

4. On January 11, 2020, the Placerville Police Department began investigating the death of Jordan Piper's son. During the investigation, law enforcement seized a digital camera and other devices. While searching the phones, investigators found evidence that the defendant, Jordan Piper, made surreptitious recordings of Minor Victim 1 while she was under the age of 18.

FBI Investigation

5. The Federal Bureau of Investigation obtained a warrant to search Jordan Piper's devices, and discovered a video on a GoPro SPTM1 camera¹ that appeared to be created on October 19, 2019 that shows the defendant in the act of removing the camera from behind a wall outlet in the bathroom of a rental home in Groveland, California. In addition, there were many videos that depicted Minor Victim 1 using the bathroom and bathing, where her genitals were visible. While the defendant and Minor Victim 1 were living in Groveland, California, there were times when defendant was the only adult in the home.

6. On Jordan Piper's Samsung cell phone, investigators found screen captures from the surreptitiously recorded videos of Minor Victim 1 in various states of undress, and usually nude. Approximately 433 nude images of Minor Victim 1 were found on Jordan Piper's cell phone in the cache and screenshots section of the phone, as well as cache folders and screenshot folders in a secure folder on the phone. Many of those images created by Jordan Piper were focused shots of Minor Victim 1's genitals or pubic area. In addition, the video camera was placed in a manner to maximize the chances of recording the genitals of Minor Victim 1 and other users of the bathroom.

¹ This GoPro camera bears an inscription reading "Made in China" and I know through experience and research that GoPro cameras are not made in California, and are not manufactured in the United States. I further know through experience and research that Samsung smartphones are not manufactured in the United States.

The file names of the screenshots are consistent with the screenshots being generated on January 9, 2020, and October 4, 2019. The October 4, 2019 screenshots matched a video file dated October 3, 2019 depicting Minor Victim 1 using the bathroom and taking a bath. Other videos, dated October 5, 2019 and October 4, 2019, that depicted Minor Victim 1 using the bathroom and bathing other children, were also located on the phone.

7. Between December 16, 2019 and December 24, 2019, the defendant sent a series of text messages concerning a sexual “Christmas gift,” and asked for the opinion of Minor Victim 1. Eventually these texts escalated into sending pictures of it to Minor Victim 1, then requesting that Minor Victim 1 use the “Christmas gift” on herself, and then offering \$250 to use it on herself.

8. I am aware that the definition of “sexually explicit conduct” includes “lascivious exhibition of the anus, genitals, or pubic area of any person.” I have reviewed the above mentioned images and videos and opine that the screenshots and videos that capture Minor Victim 1’s genitals or pubic area constitute depictions of sexually explicit conduct within the definition of 18 U.S.C. §§ 2256(2)(A)(v) and 2256(8)

IV. CONCLUSION

9. Based on the aforementioned facts and information, there is probable cause to believe that between on or about October 3, 2019, and continuing through on or about January 9, 2020, in the Eastern District of California, the defendant, Jordan T. PIPER, did employ and use a minor, “Minor Victim 1,” to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing one or more visual depictions of such conduct, to wit: video recordings and still images created from the video recordings, knowing and having reason to believe that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and such visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any

means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief. I request that the Court issue an arrest warrant.

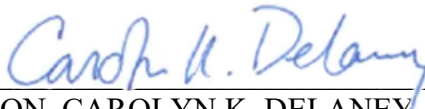
/s/

Scott A.H. Schofield
Special Agent, Federal Bureau of Investigation

Subscribed before me telephonically on:

June 21, 2022

Date



HON. CAROLYN K. DELANEY
U.S. MAGISTRATE JUDGE

Approved as to form:

/s/ ROGER YANG

ROGER YANG, Assistant U.S. Attorney

United States v. Jordan Piper
Penalties for Criminal Complaint

COUNT 1:

VIOLATION: 18 U.S.C. § 2251(a) – Sexual Exploitation of a Child

PENALTIES: Mandatory minimum of 15 years in prison and a maximum of up to 30 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment.
Special assessment of \$5,000 pursuant to 18 U.S.C. § 3014
Special assessment, pursuant to 18 U.S.C. § 2259A of no more than
\$50,000.
Supervised release of at least 5 years up to life

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 2253(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document