

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

.v.

LAWRENCE SCOTT WARD,

Defendant

CRIMINAL NO. 1:06

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Byron C. Braggs, after being duly sworn, depose and state as follows:

1. I am a Special Agent (S/A) of the United States Department of Homeland Security; United States Immigration and Customs Enforcement (hereafter referred to as "ICE") empowered under the authority of Title 19, United States Code, and Section 1589a. As a result of the federal government reorganization on March 1, 2003, the U.S. Customs Service's (USCS) Office of Investigations became a part of the newly created ICE under the Department of Homeland Security. I have served as a special agent with USCS and ICE, since June 1992.

2. I make this affidavit in support of a Criminal Complaint charging Lawrence Scott Ward with certain activities relating to material involving the sexual exploitation of minors in violation of Title 18, United States Code, Sections 2252A. According to this section, any person who "knowingly transports or ships in interstate or foreign commerce by any means including by computer

or mails, any visual depiction, if - (A) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and (B) such visual depiction is of such conduct" is guilty of an offense against the United States.

3. The facts and information in this affidavit are based upon my personal knowledge as well as the observations of other law enforcement agents and officers involved in this investigation. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the government.

4. On August 27, 2006, passenger Lawrence Scott Ward (WARD) (U.S. passport # [REDACTED]) arrived at Washington's Dulles International Airport, within the Eastern District of Virginia, from Brazil aboard United Airlines flight #860. This flight was direct from Brazil to Dulles. WARD was referred to baggage control secondary by Customs and Border Protection Officer (CBPO) Aaron Bowker at 0725 hours for possible child pornography due to excessive trips to Thailand. Thailand is a well know destination for people having sex with minors.

5. CBPO Branimar Rakuljic conducted the secondary examination and proceeded to obtain a binding declaration. WARD stated that he was in Brazil for two and a half weeks for both business and pleasure. He continued to explain that he was a professor at the University of Pennsylvania (Wharton School of

Business) and that he was doing research as well. During initial bag exam, pictures were found of WARD posing with children on a beach. When asked about the pictures WARD stated they were his girlfriend's children.

6. Further examination revealed a laptop computer. WARD hesitated and was reluctant to unlock his laptop but did so. CBPO Rakuljic then took the laptop into the interview room for further examination.

7. Upon inspection of WARD's laptop, CBPO Rakuljic discovered a video of what appeared to be two children engaging in sexual activity. These children appeared to be as young as 8 years old. Supervisory CBPO Mary Carman was notified immediately, and ICE S/A Braggs (duty agent) was contacted by CBPO Rakuljic at 0800 hours. S/A Braggs responded at 0855 hours.

8. Further examination of WARD's luggage revealed mini DVD's and a video recorder. At least 3 of the DVD's contained videos of male minors engaged in sexually explicit conduct including oral sex, masturbation, and the lascivious exhibition of the genitals. The children in the video appear to be between 14 to 16 years old. WARD himself appears in all three of the mini DVD's and is engaging sexual contact, including fellatio with the minors.

9. SCBPO Carman approved Pat down incident to arrest conducted by CBPO Lionel Grullon at 1017 hours and witnessed by CBPO Bowker. A negative pat down was concluded at 1019 hours and

WARD was placed in a holding cell. WARD was checked on every fifteen minutes thereafter and a personal detention log sheet was maintained.

10. Statement of rights was read to WARD by S/A Braggs at 1155 hours. WARD was turned over to S/A Braggs at 1420 hours. Laptop, digital video camera, mini DVD-R discs, and thumb drive were all seized on CF 6051S #3249386 and turned over to S/A Braggs. WARD's U.S. currency (\$3,126) and miscellaneous docs (driver license and U.S. passport) were also turned over to ICE on CBP form 6051R.

11. Based on the foregoing, there is probable cause to believe that on or about August 27, 2006, within the Eastern District of Virginia, Lawrence Scott WARD did unlawfully, knowingly and intentionally import into the territory of the United States child pornography, as that term is defined in 18 U.S.C. § 2256(8), in violation of 18 U.S.C. 2252A(a)(1)

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Byron C. Braggs  
Senior Special Agent  
Immigration and Customs Enforcement

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS \_\_\_\_ DAY OF August 2006.

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Hon. T. Rawles Jones, Jr.  
UNITED STATES MAGISTRATE JUDGE