
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Douglas E. Arpert
 :
 v. : Mag. No. 23-6021 (DEA)
 :
 CHRISTOPHER BUDELMAN : CRIMINAL COMPLAINT

I, Brian Teague, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

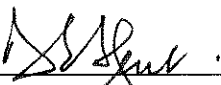
continued on the attached pages and made a part hereof.

s/ Brian Teague

Brian Teague, Special Agent
Department of Homeland Security
Homeland Security Investigations

Attested to me by telephone,
pursuant to FRCP 4.1(b)(2)(A)

September 7, 2023,
in the District of New Jersey,



HONORABLE DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

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DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

ATTACHMENT A

COUNT ONE
(Sexual Exploitation of Children)

On or about June 24, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

CHRISTOPHER BUDELMAN,

did knowingly employ, use, persuade, induce, entice, and coerce MINOR VICTIM 1, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT TWO
(Sexual Exploitation of Children)

On or about June 26, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

CHRISTOPHER BUDELMAN,

did knowingly employ, use, persuade, induce, entice, and coerce MINOR VICTIM 2, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT THREE
(Distribution of Child Pornography)

From in or around September 2021 to in or around June 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

CHRISTOPHER BUDELMAN,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and, using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Brian Teague, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. Accordingly, I have personal knowledge of the facts set forth below. Because this Complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this Complaint are related in sum and substance and in part, and all dates and figures are approximate.

1. At all times relevant to this Complaint, defendant CHRISTOPHER BUDELMAN (“BUDELMAN”) was a resident of Brick, New Jersey, located in or around Ocean County, New Jersey.

2. In or around October 2021 and in or around June 2022, law enforcement agents from the Department of Homeland Security, Homeland Security Investigations (“HSI”) and the Ocean County Prosecutor’s Office received leads from the National Center for Missing and Exploited Children (“NCMEC”) regarding the possible distribution and receipt of child pornography in and around Brick, New Jersey.

3. Upon further investigation, law enforcement obtained evidence that three Internet Protocol addresses (the “Budelman IP Addresses”)—two of which were assigned to an Internet Service Provider (“ISP”) account registered to an address in or around Brick, New Jersey where law enforcement has learned Budelman at that time resided (the “Budelman Residence”) and the other which was assigned to a cell phone account subscribed in BUDELMAN’s name at the Budelman Residence—had been used to obtain and distribute videos and images depicting child pornography between in or around September 2021 and in or around June 2022.

4. More specifically, the investigation revealed that BUDELMAN used two Kik Messenger¹ (“Kik”) accounts (the “Budelman Kik Accounts”) to send via the internet using the Budelman IP Addresses images and videos containing child pornography, including images and videos depicting prepubescent minors engaged in sexually explicit conduct, to others. The videos distributed by BUDELMAN from the Budelman Kik Accounts included, among others:

a. A video file named “83b20e14-8c1d-4e6f-98da-93b49df2a05a.mp4,” distributed from one of the Budelman Kik Accounts to

¹ Kik Messenger is a free instant messaging mobile application.

other Kik accounts on or about September 30, 2021, which is approximately one minute and fourteen seconds in duration. The video file depicts a male toddler appearing to be between 3 and 5 years old wearing a "Paw Patrol" cartoon t-shirt and no clothing below his waist. During the video, the toddler attempts to insert his penis into a female adult's exposed buttocks and eventually inserts his fingers and penis into the adult female's vagina.

b. A video file named "c6b32c3d-8b88-4d17-a17a-3507cb841b5f.mp4," distributed from one of the Budelman Kik Accounts to other Kik accounts on or about October 2, 2021. The video file is approximately one minute and fifty-nine seconds in duration and depicts three naked prepubescent females and one naked prepubescent male, who appear to be between 8 and 11 years old. During the video, two of the prepubescent females straddle the prepubescent male who is laying on his back, and the prepubescent females are seen placing their hands on the other prepubescent females' bodies.

c. A video file named "67189e83-0eef-4a84-999e-80202aba18bd.mp4," distributed from one of the Budelman Kik Accounts to other Kik accounts on or about June 16, 2022, which is approximately one minute and ten seconds in duration. The video file depicts a naked, prepubescent female appearing to be between 6 and 9 years old. During the video, an adult male inserts his penis into the prepubescent female's vagina while he moves back and forth.

5. Based on the information provided by NCMEC and further investigation conducted by law enforcement officers, law enforcement applied for and later obtained a warrant authorizing the search of the Budelman Residence. Law enforcement executed that search warrant on or about September 27, 2022 (the "September 27 Premises Search").

6. While executing the September 27 Premises Search, law enforcement seized, among other things, a desktop computer found in BUDELMAN's bedroom (the "desktop computer"). Pursuant to the search warrant, law enforcement was authorized to search the desktop computer for evidence of crimes described in the application for the warrant. A subsequent forensic examination of the desktop computer revealed, among other things, approximately nine (9) videos containing child pornography. Those videos included recordings of video chats via a free online chat site between BUDELMAN and pubescent and prepubescent minors depicting the minors engaged in sexually explicit conduct.

7. For example, one of the videos produced using the free online chat site on or about June 24, 2022, was approximately one minute and forty-two seconds long, and depicted MINOR VICTIM 1, a prepubescent, 12-year-old minor living in a state outside of New Jersey who is naked throughout the

entire video, digitally penetrating herself at BUDELMAN's direction. In the video, BUDELMAN was recorded masturbating while MINOR VICTIM 1 performed sexual acts. The video also recorded a chat log between BUDELMAN and MINOR VICTIM 1, during which BUDELMAN directed MINOR VICTIM 1, in sum and substance, to continue performing sex acts.

8. Another video produced using the free online chat site on or about June 26, 2022, was approximately one minute and fifty-two seconds long, and depicted MINOR VICTIM 2, a 14-year-old pubescent minor living in a state outside of New Jersey at the time who was naked throughout the entire video, digitally penetrating herself at BUDELMAN's direction. In the video, Budelman was recorded masturbating while MINOR VICTIM 2 performed sexual acts. The video also recorded a chat log between BUDELMAN and MINOR VICTIM 2, during which BUDELMAN directed MINOR VICTIM 2, in sum and substance, to continue performing sex acts.

9. Based on the records obtained by law enforcement, interviews of MINOR VICTIMS 1 and 2 (both of whom were living outside of the state of New Jersey during the relevant period), and my education, training, and experience, the videos stored on the desktop computer were transmitted in interstate or foreign commerce using the internet via the free online chat site, and/or produced by BUDELMAN using the desktop computer, which contained materials that were mailed, shipped, and transported in or affecting interstate or foreign commerce.

10. Moreover, based on the records obtained by law enforcement, the videos distributed by Budelman via the Budelman Kik Accounts were transported or transmitted by BUDELMAN using the internet and thus, were in or affecting interstate or foreign commerce.