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UNITED STATES ATTORNEY

By: *Katelyn R. Waegener*

Katelyn R. Waegener
Special Assistant U.S. Attorney

Date: September 18, 2023

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

LOUIS GOLDENBERG

Case No.

23-mj-17042 (SAK)

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 September 18, 2023 in the county of Burlington in the

District of New Jersey, the defendant(s) violated:

Code Section

Description of Offenses

Title 18, USC, § 2442(b)

Attempted Online Enticement of a Minor to Engage in Prostitution. See Attachment A.

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

Aliya Simnor

Complainant's signature

Aliya Simnor, Special Agent, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Sharon A. King

Date: Sep. 18, 2023

Judge's signature

City and state: District of New Jersey

Hon. Sharon A. King, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

(Attempted Online Enticement of a Minor to Engage in Prostitution)

On or about September 18, 2023, in Burlington County, in the District of New Jersey,
and elsewhere, defendant

Louis Goldenberg

did, using the mail or any facility or means of interstate or foreign commerce, knowingly
persuade, induce, entice and coerce any individual who has not attained the age of 18 years, to
engage in prostitution or any sexual activity for which any person can be charged with a criminal
offense, or attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

ATTACHMENT B

I, Aliya Simnor, being duly sworn, do hereby depose and state:

I. BACKGROUND

1. I have been a Special Agent with the U.S. Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”) since 2020. As a Special Agent, I am authorized to investigate violations of laws of the United States, and I am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
2. I make this affidavit in support of an arrest warrant for Louis Goldenberg (GOLDENBERG), for a violation of Title 18, United States Code, Section 2422(b), attempted enticement of a minor to engage in prostitution.
3. The statements contained in this affidavit are based upon my investigation, information provided by other HSI agents and law enforcement officers, and my experience and training as a Special Agent.
4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, 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 to arrest GOLDENBERG for the crime of attempted enticement of a minor to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

II. FACTS SUPPORTING PROBABLE CAUSE

5. On July 24, 2023, an HSI agent, working in an undercover capacity (“UC”), created a post on DoubleList¹ to assist in identifying child predators seeking to sexually exploit children. The undercover post was titled, “F@mily Adventures,” and the description included the following, “Hi, looking for like minded people who want to join in some family adventures. Not looking for anyone who uses drugs. Must be a nice person ;).” The post advertised for the Philadelphia, Pennsylvania area.
6. On August 10, 2023, GOLDENBERG replied to the ad using a Google email address that contained his name. The email signature attached to the responses from email address stated, “Louis Goldenberg xxx-xxx-1688.” The picture associated with the email account was a picture of a white male standing in front

¹ Doublelist is an online platform that operates as a classified ads website, primarily catering to individuals seeking casual encounters and personal connections. Users can create postings that other users can then respond to.

of a fence. The following is an excerpt of the conversation between GOLDENBERG and the undercover email account (“UCE”) that occurred on August 10, 2023:

GOLDENBERG 5:58 PM: Sounds HOT and Iâ€™m interested. Can send more info if still looking

UCE 8:14 PM: Hi, sure what stuff are u into? I’m an aunt² with a 12 year old niece³

GOLDENBERG 8:18 PM: Role play has been a fantasy of mine and would love to live out a family scenario. Aunt & uncle. Bro & sis, etc What do you think?

UCE 8:23 PM: What do you mean by role play? Between me and you or you and her?

GOLDENBERG 8:24 PM: What type of adventures are you into?

GOLDENBERG 8:26 PM: You and I but not opposed to all three

GOLDENBERG 8:34 PM: Are we remotely on the same page? This is me. Below is the picture sent from GOLDENBERG to the UCE.

7. On August 10, 2023, at 9:53 PM, GOLDENBERG, using the email address jeffstrong215@gmail.com, replied for the first time to the same DoubleList ad he replied to using the Google email address that contained his name. The following is an excerpt of the conversations between GOLDENBERG and the UCE that occurred between August 10 and August 23, 2023:

GOLDENBERG August 10, 2023 9:53 PM: Hey - I am a 40 year old professional living in Center City and would like to know more about your family adventures and possibly join in

UCE August 11, 2023 10:57 AM: Hi, 'm 36 an aunt and I have a 12 year old niece. What are you interested in? I'm just cross the bridge lol on the jersey side

GOLDENBERG August 19, 2023 1:33 PM: I’m fine with Jersey. Especially with a 36 aunt and her 12 year old niece. Sounds HOT

UCE August 20, 2023 8:29 PM: Lol have you ever been with someone that young? I'm husy cautious and not looking for any drama ya know?

GOLDENBERG August 20, 2023 8:45 PM: I can assure you that will not cause you drama just fun times

² The fictious aunt refers to herself as Grace.

³ The fictious 12 year old niece is referred to as “Maddie.”

UCE August 21, 2023 10:34 AM: Sounds good to me lol but just so you know i don't participate in it, it would just be her and u

GOLDENBERG August 21, 2023 11:13 AM: That sounds good too

...

GOLDENBERG August 21, 2023 9:57 PM: That's HOT!! You sound like a great aunt and I will do what's needed to make sure everyone is comfortable with each other. I am experienced and enjoy being with women of all ages, even at the prime age of 40, but yes I prefer younger. Does she enjoy being with someone old enough to be her father?

GOLDENBERG August 23, 2023 9:47 AM: When can we meet?

GOLDENBERG August 23, 2023 9:56 AM: This evening?

8. On August 23, 2023, GOLDENBERG suggested to the UCE that they communicate using Kik Messenger. Between August 23 and September 15, 2023, GOLDENBERG continued to communicate with the undercover agent, via Kik Messenger, to discuss setting up payment options as well as a time and location for GOLDENBERG to have sex with "Maddie." The following are some of the conversations that took place between GOLDENBERG and the undercover Kik Account (UCK) that occurred between August 24 and September 11, 2023:

UCK August 24, 2023: So u said u like them young? Do u think 12 is good for u?

GOLDENBERG August 24, 2023: I think it's hot and will be fun if she like being with older men

GOLDENBERG August 24, 2023: I am totally turned on by it and looking forward

...

GOLDENBERG August 28, 2023: Let Aunt Grace watch Maddie's wet pussy cat bounce on uncle Jeff's hard cock

UCK August 28, 2023: yesss

UCK August 28, 2023: ud wear protection right?

GOLDENBERG August 28, 2023: whatever you want

UCK August 28, 2023: wat do u normally do?

GOLDENBERG August 28, 2023: I normally wear a condom by I also avoided girls w/diseases

UCK August 28, 2023: Maddie is 12 to young for diseases lol

UCK August 28, 2023: let's keep it that way

GOLDENBERG August 28, 2023: I know!!!

UCK August 28, 2023: So on u to bring condoms lol

GOLDENBERG August 28, 2023: anything else

GOLDENBERG August 28, 2023: I will bring plenty of condoms

UCK August 28, 2023: Idk bring whatever u want lol as long as its not too crazy

UCK August 28, 2023: I mean u could being a stuff dog animal shed feel comfortable but idk if that's wat u meant lol

GOLDENBERG August 28, 2023: (Sent a pillow of a husky's head)

GOLDENBERG August 28, 2023: where will I be hosting?

UCK August 28, 2023: well you tell me ur thoughts where would like us to meet u

GOLDENBERG August 28, 2023: How about Center City?

GOLDENBERG August 28, 2023: I have status at all bonvoy hotels if there is a preference

GOLDENBERG August 28, 2023: Somewhere in NJ also works

UCK August 30, 2023: Oh do you?

UCK August 30, 2023: Fancy lol

UCK August 30, 2023: That would be harder, NJ works better for us. I think there's some bonvoy hotels here? I don't actually kno the brand

GOLDENBERG August 30, 2023: what towns in NJ work best and I'll find some options

GOLDENBERG August 30, 2023: Yes I do prefer nicer hotels lol

GOLDENBERG August 30, 2023 5:58 PM: Only the finest for Maddie and aunt Gracie

UCK August 30, 2023 5:58 PM: Oh good wat about Mt Laurel nj?

UCK August 30, 2023: There's some bonvoy hotels here? That's Hilton?

GOLDENBERG August 31, 2023: my Laurel works

UCK August 31, 2023: Oh nice guessing u found a bonvoy lol

UCK August 31, 2023: I feel like U really do want to meet and I am trusting u and I kno u asked for one so I can send a pic but again I just don't want u sending or sharing

GOLDENBERG August 31, 2023: My eyes only

UCK August 31, 2023: (Sends two pictures)

GOLDENBERG August 31, 2023: Is the first picture the two of you?

GOLDENBERG August 31, 2023: She looks like she has a perfect young body

GOLDENBERG August 31, 2023: Lookin forward to seeing those lips

around my hard cock

UCK August 31, 2023: Can u tell what u look like so I can tell her? Pic?

GOLDENBERG August 31, 2023: (Sends three pictures of himself and one picture of his penis)

GOLDENBERG August 31, 2023: I'm actually golfing in Mt Laurel after work

GOLDENBERG September 1, 2023: Saw a young girl on the course wearing a short golf skirt and started thinking how sexy Maddie would look in one

...

GOLDENBERG September 5, 2023: have you heard of this place?
<https://feathernestinn.com>

GOLDENBERG September 5, 2023: Idk. It looked fun. And rooms have hot tubs which could also be fun

GOLDENBERG September 5, 2023: Looks like it's in cherry hill which is fine right next to Mt laurel

UCK September 5, 2023: any other thoughts on if u wanted to bring other stuff lol

GOLDENBERG September 5, 2023: I can def bring lube and the pillow I guess

...

GOLDENBERG September 6, 2023: The money part was actually comforting. I'll pay money for a fun time as long as I don't get in trouble for it... if that makes sense

UCK September 6, 2023: I'm glad, u will definitely get a fun time and I would like to talk about prices because I Don't know how long u want to have her for lol

GOLDENBERG September 6, 2023: Whenever you are ready to talk lmk

...

GOLDENBERG September 7, 2023: Starting to get excited at my desk lol

UCK September 7, 2023: Oh my thank God ur working from home (emoji laughing face)

GOLDENBERG September 7, 2023: (sent picture of his penis and an open screen laptop in the middle of his legs. The picture appears to have the suspect laying on his bed)

UCK September 7, 2023: Can I ask what ur watching that got ur excited

GOLDENBERG September 7, 2023: Family adventures . . . and mental images lol

UCK September 7, 2023: Do u watch any young videos⁴
 GOLDENBERG September 7, 2023: sure . . . any recommendations?
 GOLDENBERG September 7, 2023: I just google for the most part
 . . .
 UCK September 11, 2023: I know didn't know if u still wanted
 to with Maddie
 UCK September 11, 2023: want to try and have her for next
 Monday but didn't kno if u were available
 GOLDENBERG September 11, 2023: Definitely still interested
 GOLDENBERG September 11, 2023: What time typically works best
 UCK September 11, 2023: I was thinking 6ish
 UCK September 11, 2023: I didn't really like the hotel u
 mentioned lol I Googled it and looked sketchy on the
 outside
 UCK September 11, 2023: Wat do u think about Hotel 1⁵ in Mt
 laurel?
 GOLDENBERG September 11, 2023: I have seen Hotel 1 and it looks
 nice
 GOLDENBERG September 11, 2023: And it's Bonvoy hotel Lol
 GOLDENBERG September 11, 2023: Money saved goes to the good cause
 lol (sent emoji of three tongues, one eggplant three water
 drops)
 GOLDENBERG September 11, 2023: Monday it is!!
 UCK September 11, 2023: Let me kno when u book it
 hopefully it's not full lol
 GOLDENBERG September 11, 2023: Booked
 UCK September 11, 2023: How long do u anticipate being with
 Maddie for Monday
 GOLDENBERG September 11, 2023: As long as you two are able
 UCK September 11, 2023: I don't want to keep her out to late
 and also depends on the pricing to
 UCK September 11, 2023: U good with us leaving by 10 for
 \$300
 GOLDENBERG September 11, 2023: That works
 UCK September 11, 2023: OK so \$300 in cash?
 GOLDENBERG September 11, 2023: That's fine

⁴ Based upon on my training and experience I know that the phrase “young video” is street language for pornographic videos featuring underage children, also known as Child Sexual Abuse Material (“CSAM”).

⁵ The true identity of Hotel 1 is known to law enforcement.

9. On September 18, 2023, at approximately 6:00 PM, GOLDENBERG arrived at Hotel 1 in Mount Laurel Township, New Jersey. Agents executed a probable cause arrest and apprehended GOLDENBERG as he attempted to check in to the hotel.

10. During the search incident to arrest, GOLDENBERG was found to be in possession of \$300.

Aliya Simnor

Aliya Simnor
Special Agent, HSI

Pursuant to Fed. R. Crim. P. 4.1, Special Agent Aliya Simnor was sworn and attested to the contents of this affidavit in support of the issuance of an arrest warrant and criminal complaint charging defendant LOUIS GOLDENBERG with Attempted Online Enticement of a Minor to Engage in Prostitution, as set forth in Attachment A.

Sharon A. King

HON. SHARON A. KING
United States Magistrate Judge

Date: September 18, 2023