

UNITED STATES DISTRICT COURT

for the

EASTERN DISTRICT OF MISSOURI

United States of America
v.
Christopher David Schroeder

Case No. 4:15 MJ 7329 SPM

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 11/8/2015 to 12/1/2015 in the county of Warren County in the Eastern District of Missouri, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18:2251(a); and 18:2423(a) and 18:2, Production of Child Pornography and Transportation of a Minor with Intent to Engage in Criminal Sexual Activity

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Handwritten signature of John Mark Burbridge, Complainant's signature, S.A. John Mark Burbridge, Printed name and title

Sworn to before me and signed in my presence.

Date: 12/02/2015

Handwritten signature of Shirley Padmore Mensah, Judge's signature

City and state: St. Louis, Missouri

Honorable Shirley Padmore Mensah, U.S. Magistrate Judge, Printed name and title

1. This affiant, John Mark Burbridge, has been employed as a Special Agent for the Federal Bureau of Investigation for approximately twenty-eight (28) years and is currently assigned to investigate crimes against children. During the course of this time period, this affiant has had numerous contacts and dealings with police officers, individuals known to possess and/or sell obscene material, as well as subjects known to possess, distribute, and or manufacture child pornographic images and/or videos. This affiant has received training in the area of internet crimes against children. This affiant has assisted in numerous investigations and search warrants relative to the crimes of manufacturing, possessing, production and/or distributing child pornography.
2. The statements in this affidavit are based in part on this affiant's personal knowledge and/or information provided by other law enforcement officers, and/or statements provided by A.B. Since this affidavit is being submitted for the limited purpose of securing a warrant, this affiant has not included each and every fact concerning this investigation.
3. In late October 2015 or early November 2015, the defendant met fifteen-year-old A.B. through Kik, an internet chat forum. A.B. informed defendant that she was unhappy at home, and defendant advised he would pick her up and help her. A.B. informed the defendant she was only fifteen-years old during one of the chats.
4. On or about November 8, 2015, defendant drove to [REDACTED] Ohio and picked up A.B. near her residence. Once A.B. was in defendant's vehicle, defendant made A.B. remove the SIM card from her cellular telephone and broke the SIM card into pieces. Defendant also had A.B. remove the battery from her cell phone. A.B. did not know where defendant lived or where she was being taken.
5. While transporting A.B. to his residence, defendant told A.B. that he intended to have sex with her as soon as they reached his residence. A.B. informed the defendant again that she was only fifteen-years old. Defendant only stopped to purchase gas during the transport.
6. Upon arrival at defendant's residence, 1524 South Lake Sherwood Drive, Marthasville, Missouri, which is located in the Eastern District of Missouri, the defendant engaged in sexual intercourse with A.B. Defendant told A.B. she was to have sex with him and needed to clean the house. Furthermore, A.B. was not to use the internet or telephone unless she spoke to him first. Defendant instructed A.B. not to provide her real name to anyone and that she needed to change her appearance by cutting and/or coloring her hair. Defendant also told A.B. that she needed to lose weight. At the residence, defendant smashed A.B.'s cellular telephone and tossed the broken cellular telephone in a river. While at the residence defendant engaged in sexual intercourse with A.B. on multiple occasions.
7. A.B. told defendant that she wanted to go home, but defendant told her she was not allowed to go home. A.B. was afraid to leave because the defendant had numerous guns in his residence.
8. Based on information received from the Ohio Internet Crimes Against Children, on December 1, 2015, investigators from the Warren County Police Department went to defendant's residence where A.B. was recovered. Search warrants were obtained for digital media contained in the residence and evidence of his travel to Ohio. Defendant told law enforcement officers that he believed A.B. was eighteen years of age and that another individual brought A.B. to Missouri from Ohio.
9. During the search of defendant's residence, video cameras and a DVR, and other items were recovered. Two cameras were located in defendant's bedroom with the focus point being the bed. The DVR contents were reviewed and videos were located. One of the videos depicted defendant engaging

in sexual intercourse with A.B. The video cameras and DVR were not manufactured in Missouri and therefore traveled in interstate commerce.

10. During the search of defendant's vehicle, a receipt was located showing the purchase of food from the McDonalds in ██████████, Ohio. Defendant also received a traffic violation and the traffic ticket was located in a computer case. The date on these items was November 8, 2015.

11. A person commits statutory rape in the second degree if being twenty-one years of age or older, he has sexual intercourse with another person who is less than seventeen years of age. Missouri Revised Statute, 566.034.1. It is an affirmative defense that the defendant reasonably believed that the child was seventeen years of age or older. See Missouri Revised Statute, 566.020.2.