

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Sven K. Ljaamo

Case No.

25-mj-7213-JCB

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 March 21, 2025 in the county of Middlesex in the
 District of Massachusetts, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)(A)

Receipt of Child Pornography

18 U.S.C. § 2252A(a)(5)(B)

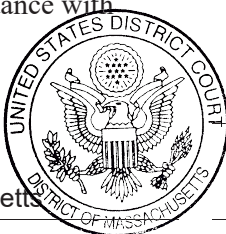
Possession of Child Pornography

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent Brandon Roque.

☒ Continued on the attached sheet.*Complainant's signature*

Brandon Roque, FBI Special Agent

*Printed name and title*Subscribed and sworn to via telephone in accordance with
Federal Rule of Criminal Procedure 4.1.Date: 04/22/2025City and state: Boston, Massachusetts

Hon. Jennifer C. Boal, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brandon Roque, a Special Agent with the Federal Bureau of Investigation, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”) since August 2023. I am currently assigned to the Boston Division Lowell Resident Agency, where I investigate violent crimes against children (“VCAC”), and have participated in fraud, narcotics, transnational organized crime, and white-collar investigations. While employed with the FBI, I have investigated federal criminal violations related to, among other things, the online sexual exploitation of children. As a Special Agent with the FBI, I have conducted investigations into the production, attempted production, distribution, receipt, and possession of child pornography, including executing federal search warrants and criminal complaints. I have received training in the investigation of child pornography, child exploitation, and transportation of minors, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. I have assisted in investigations conducted by the FBI Boston Child Exploitation and Human Trafficking Task Force and completed Child Abduction Rapid Deployment Training. During my training at the FBI Academy in Quantico, Virginia, I received training on a variety of criminal investigative matters relating to conducting these types of investigations.

2. This affidavit is submitted in support of an application for a criminal complaint charging Sven Knudsen LJAAMO (“LJAAMO”), with possession and receipt of child pornography in violation of 18 U.S.C. § 2252A.

3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals participating in the investigation, including other law enforcement officers, my review of documents and computer records related to this investigation, communication with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit does not contain 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 for the issuance of the requested criminal complaint.

STATEMENT OF PROBABLE CAUSE

The NCMEC CyberTip

4. The National Center for Missing and Exploited Children (“NCMEC”) is a nonprofit organization that, among other things, strives to help find missing children, reduce child exploitation, and prevent child victimization.

5. NCMEC launched the CyberTipline in 1998 to serve as the national online clearinghouse for tips and leads about child sexual exploitation. The CyberTipline is the method through which the public and electronic service providers (ESPs) may report the enticement of children for sexual acts, extra-familial child sexual molestation, child pornography, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, and misleading words or images on the internet.

6. On January 23, 2025, Billerica Police Department received a NCMEC CyberTip Report submitted by Google, LLC (“Google”) (the “CyberTip”). Google reported that between May 8, 2024, and September 10, 2024, a particular Google account (“the Google Account”) uploaded 108 files of suspected child pornography to Google Drive and Google Photos.

7. A review of the files revealed multiple files containing child pornography, as defined in 18 U.S.C. § 2256(8). For example, one of the files uploaded to the Google Account on September 10, 2024, contained the image described below¹:

- a. The image depicts a prepubescent female child lying on her knees and forearms. The female child is wearing only a rainbow stripe colored top and she is looking back at the camera smiling. In this image, an adult male can be seen on his knees behind the child. The image appears to be taken from the point of view of the adult male. The image shows the adult male's erect penis and his right hand placed on the right buttock of the female child. The male appears to be anally raping the child. Based upon the child's facial features, the small size of her body, and her lack of body development, the child appears to be approximately 5 to 8 years of age.

¹ I am aware that the “preferred practice” in the First Circuit is that a magistrate judge view images that agents believe constitute child pornography by virtue of their lascivious exhibition of a child's genitals. *United States v. Brunette*, 256 F.3d 14, 17-19 (1st Cir. 2001) (affiant's “legal conclusion parroting the statutory definition [...] absent any descriptive support and without an independent review of the images” insufficient basis for determination of probable cause). Here, however, the descriptions offered “convey to the magistrate more than [my] mere opinion that the images constitute child pornography.” *United States v. Burdulis*, 753 F.3d 255, 261 (1st Cir. 2014) (distinguishing *Brunette*). The children described herein in these examples are approximately four to thirteen years old—in all events, younger than eighteen. Furthermore, the descriptions of the files here are sufficiently specific as to the age and appearance of the alleged children as well as the nature of the sexual conduct pictured in each file, such that the Court need not view the files to find that they depict child pornography. *See United States v. Syphers*, 426 F.3d 461, 467 (1st Cir. 2005) (“The best practice for an applicant seeking a warrant based on images of alleged child pornography is for an applicant to append the images or provide a sufficiently specific description of the images to enable the magistrate judge to determine independently whether they probably depict real children.”) (emphasis added); *see also United States v. LaFortune*, 520 F.3d 50, 56 (1st Cir. 2008) (similarly emphasizing *Syphers* court's use of “or” in describing the *Brunette* “best practice”). Where I have included such nonconclusory, sufficiently specific descriptions, this Court need not view the imagery to find that they depict child pornography. Nonetheless, the described imagery is available for review at the Court's request.

8. Additionally, more than 20 of the flagged files had original file names that included the word “Tumblr” or “tumblr.” One of these “Tumblr” files was uploaded to the Google Account on September 9, 2024, and contained the image described below:

- a. The video includes audio and is approximately 37 seconds in length. In the video, a female child can be seen sitting on a couch fully nude with an adult man. The adult man is fully nude and his penis is fully erect. The adult man’s face is not visible in the video. In the video, the adult male can be seen putting his penis into the female child’s mouth while the adult male grabs the back of the female child’s head. Approximately 28 seconds into the video, the man removes his penis from the child’s mouth and the child appears to spit onto her genital area. Based upon the child’s body development and facial features, the child appears to be 9 to 13 years old.

9. Google reported that the name provided by the user of the Google Account was “Sven Ljaamo.” The CyberTip provided information about the Google Account user, including an alternate email account and the phone numbers the user provided to Google, as well as the IP addresses that were used to log into the Google Account from December 16, 2023, through September 10, 2024. Investigators traced that alternate email account, at least one phone number, and several IP addresses to LJAAMO and to LJAAMO’s place of work at the Bedford Veterans Affairs Medical Center, where he is employed as a physician.

10. Based in part on the information contained in the CyberTip, investigators obtained federal search warrants to search LJAAMO’s residence and LJAAMO’s work office. The affidavit submitted in support of the search warrants is attached as Sealed Exhibit 1 and incorporated herein by reference.

LJAAMO's Statements to Law Enforcement

11. On March 21, 2025, agents executed first, the residential search warrant, and then the search warrant for LJAAMO's office.

12. LJAAMO and his wife were present at LJAAMO's residence when investigators arrived. LJAAMO was advised of and waived his *Miranda* rights and agreed to speak with FBI agents and to provide a written statement. Any statements attributed to LJAAMO herein are set forth in sum and substance unless specifically denoted as verbatim quotes.

13. During his conversation with federal agents, LJAAMO admitted that Google notified him that his account, the Google Account, was shut down due to the account uploading child pornography. Although LJAAMO denied purposely uploading child pornography with the Google Account, LJAAMO did not deny that the files on the Google Account came from LJAAMO's device or devices. LJAAMO instead suggested that Google itself or "someone else" had uploaded the files without LJAAMO's permission.

14. LJAAMO eventually admitted to viewing sexually explicit material involving female minors and to subsequently saving this material to his devices for future viewing. In a written statement, LJAAMO confirmed that he has, for example, bookmarked and accessed a website called "Teen Leaks 5-17," which, according to LJAAMO, contains child pornography involving children from 5 to 17 years old. LJAAMO also admitted to accessing the websites "METart," which, according to LJAAMO, stands for "Most Erotic Teens art," and "CUM4K," both of which, LJAAMO stated, "depict young girls engaged in sexual acts."

15. In his written statement, LJAAMO also explained that he downloaded child pornography from Tumblr and X (formerly Twitter), specifically, and that he "intentionally viewed

child pornography involving sexual acts and sexual situations performed by grown adult men and women on male and female minors.”

16. During his conversation with law enforcement, LJAAMO provided information about his organization of the child pornography LJAAMO has saved to his devices. Specifically, among other information, LJAAMO stated that he has created folders titled “Y,” and that “Y” stands for “young.”

Search of LJAAMO’s Devices

17. That same day, investigators seized and searched several of LJAAMO’s devices.

18. Consistent with LJAAMO’s statements, during the initial on-scene review of some of the seized devices, investigators found several folders titled “Y” across the devices. In particular, during the search of his residence, investigators found a laptop and a phone, each of which contained a folder titled “Y.”

19. On the laptop, inside the “Y” folder, investigators found tens of thousands of pornographic and/or erotic images and videos. At least two of the files in this folder looked like files that had been flagged in the CyberTip. The file names of these two files included the word “Tumblr” and matched the file names reported in the CyberTip. I describe those files below:

- a. One image depicts two female children. Minor Female 1 is on her hands and knees on a chair with her rear facing the camera. Minor Female 1’s anus and genitals are exposed to the camera. Minor Female 2 can be seen placing her head on the buttock of Minor Female 1 while facing the camera. Minor Female 2’s hands are grabbing the buttock of Minor Female 1 and pulling Minor Female 1’s buttock and vagina to expose more of Minor Female 1’s genitals for the camera. Based upon both

children's facial features and lack of body development, the children appear to be approximately 10 to 12 years of age.

- b. Another image depicts a prepubescent female child lying on her knees with her buttocks pointed towards the camera. The female child's anus and genitals are exposed. The female child does not have vaginal or pubic hair development. The image shows only the area from the female child's mid stomach to her mid-thigh. Based upon the child's lack of body development, including the lack of public hair and the small size of her body, the child appears to be approximately 4 to 8 years of age.

20. This "Y" folder also contained files that investigators identified as child pornography, and which did not appear to match any of the CyberTip files, including the file described below:

- a. The image depicts a prepubescent female child on her knees facing an adult male who is sitting down. The male is not wearing pants or underwear and his fully erect penis is exposed. The child's right hand can be seen holding the male's penis and the child's mouth is on the male's penis, while the child is looking into the camera. Based upon the child's facial features and lack of body development, including the child's hand size, the child appears to be approximately 8 to 10 years of age.

21. Consistent with LJAAMO's statements to investigators, during the on-scene review of this folder, investigators saw that the folder generally contained pornographic and/or erotic content involving young-looking females. These files will be sent to NCMEC to determine the age and identity of the people depicted.

22. On the phone referenced above, inside the “Y” folder, investigators found hundreds of pornographic and/or erotic images and videos. One of the files investigators identified as child pornography is described below:

- a. This video file contains audio and is approximately one minute and thirty seconds in length. Within the video, a minor female child can be seen on a couch on her knees and forearms. In the video, the female child’s underwear is pulled down to the base of her hips while an adult male is vaginally raping the child from behind the child. Based upon the child’s lack of body development, the size of her body, including her arms and legs, and her facial features, the child appears to be approximately 11 to 13 years of age.

23. This folder also contained approximately 11 images that appeared to be created with artificial intelligence (AI), and which depicted young, child-like, or prepubescent females. One of those images is described below:

- a. This image depicts an apparently prepubescent female child kneeling before an adult male. The female child appears to have a small head and cherubic face. In the image, the female child appears to have sweat and tears on her face as well as semen inside of her mouth and on her face. The adult male’s erect penis can be seen under the chin of the female child and touching her chin, while the adult male’s hand is on the head of the female child. The adult male’s hand is large in comparison to the female child’s head. Based upon the child’s head size and facial features and the contrast in size between the two parties, the image appears to be depicting a child approximately 7 to 10 years of age.

24. Due to the nature of the AI images, further review is necessary to determine whether these images were generated using photos of real minors. Overall, just like the “Y” folder on the laptop, investigators saw that this folder generally contained pornographic and/or erotic content involving young-looking females. These files will be sent to NCMEC to determine the age and identity of the people depicted.

25. During the search of LJAAMO’s work office, investigators found another phone that also contained a folder titled “Y.” Like the other “Y” folders, this folder generally contained pornographic photos and videos involving young-looking females. As noted below, further review of these images is pending.

26. Although LJAAMO specifically discussed the “Y” folders with investigators, investigators learned that LJAAMO had stored child pornography outside of those folders, too. For example, when investigators searched for the word “kid” within the phone found at his residence, investigators found the following image outside of the “Y” folder:

- a. This image depicts a prepubescent female child lying on a bed. The female child appears to be posing for the image and has one hand behind her head. In the image, the female child is wearing a t-shirt of a cartoon cat and black and yellow striped leg stockings. The female child’s genital area is exposed. Based upon the child’s lack of body development, including the lack of pubic hair, her small size and stature, including the size of her hands, and her facial features, the child appears to be approximately 5 to 8 years of age.

27. Over 20 devices were seized pursuant to the search warrant and remain in the custody of FBI. Because of the volume of images, forensic analysis of all devices, including the devices described above, is ongoing.

CONCLUSION

28. Based on all the foregoing, I submit that there is probable cause to believe that:

- a. on March 21, 2025, in the District of Massachusetts, LJAAMO knowingly possessed material that contained one and more images of child pornography, as defined in 18 U.S.C. § 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B);

(This space intentionally left blank.)

25-MJ-7213-JCB

- b. From at least May 8, 2024, through March 21, 2025, in the District of Massachusetts, LJAAMO knowingly received any child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A).

Sworn to under the pains and penalties of perjury,

Brandon Roque

Special Agent Brandon Roque
Federal Bureau of Investigations

Sworn to before me by telephone in accordance with Fed. Rule Crim. P. 4 this 22nd day of April, 2025.

Jennifer C. Boal
HONORABLE JENNIFER C. BOAL
United States Magistrate Judge

