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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Jessica S. Allen  
 :  
 SEAN LYNCH : Mag. No. 23-8071  
 :

I, Kathryn Illuminati, being duly sworn, state 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 United States Secret Service, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

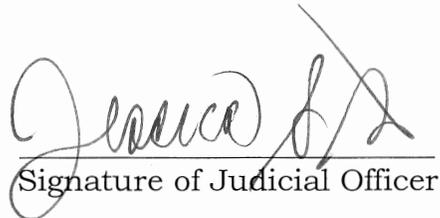
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\_\_\_\_\_  
Kathryn Illuminati, Special Agent  
United States Secret Service

*JSA*  
*5/9/23*  
~~Special Agent Illuminati attested to this Complaint by telephone pursuant to F.R.C.P. 4.1, on May 9, 2023.~~

HONORABLE JESSICA S. ALLEN  
UNITED STATES MAGISTRATE JUDGE



\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

(Distribution of Child Pornography)

Between on or about November 9, 2022 and on or about November 14, 2022, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**SEAN LYNCH,**

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

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

**ATTACHMENT B**

I, Kathryn Illuminati, am a Special Agent with the United States Secret Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Between on or about November 9, 2022 and on or about November 14, 2022, an individual, later identified as the defendant SEAN LYNCH (“LYNCH”), used an account with an identified screen name (the “Account”) on an instant messaging mobile application (the “App”) to send approximately seventy-two (72) videos of child pornography to other individuals. Three of the videos are described in the table below:

<b>Filename</b>	<b>Description</b>
bbaaba37-4c9a-4842-849a-ca6a18d505ad.mov	This video depicts a masturbating prepubescent female, sitting on the floor nude. The video is approximately 1 minute and 7 seconds in length.
550cddd3-a0eb-4030-ad37-5c0f4136b686.mp4	This video depicts a nude prepubescent female performing fellatio on the erect penis of an adult male in the shower. The video is approximately 1 minute and 16 seconds in length.
a0493ab8-01bf-4857-b3fe-b484eb082f4c.mov	This video depicts an adult male with an erect penis anally penetrating a prepubescent female who is wearing a nightgown pushed up to her shoulders. The video is 1 minute and 22 seconds in length.

2. Records obtained by law enforcement revealed that the Account posted the seventy-two videos, during multiple sessions, to the App using multiple Wi-Fi Internet Protocol (“IP”) addresses between on or about November 9, 2022 and on or about November 14, 2022. These records reveal that the IP addresses are serviced by either Service Provider 1 (the “Service Provider-1 IP Addresses”) or a University located in New Jersey (the “University” and the “University IP addresses”).

3. Records obtained from Service Provider 1 show that the Service Provider-1 IP Addresses are registered to LYNCH's residence in Summit, New Jersey and to a telephone number ending in 5805 (the "5805 Number"). Records obtained from the University show that LYNCH lists the 5805 Number as his personal cell phone number.

4. Records obtained from the University show that LYNCH also used the University IP addresses to access the App between November 9, 2022 and November 14, 2022 during the times that the Account distributed videos of child pornography in the App.

5. Based on its investigation, on or about May 8, 2023, law enforcement executed lawfully obtained search warrants at defendant LYNCH's assigned room at the University and for his person. During the search, law enforcement seized an Apple iPhone, which law enforcement confirmed was the phone that uses the 5805 Number (the "5805 Phone").

6. After being advised of and waiving his *Miranda* rights, LYNCH made a recorded statement. LYNCH advised law enforcement, in sum and substance, that he used the Account on the App while using the 5805 Phone to distribute videos of child pornography, including between on or about November 9, 2022 and on or about November 14, 2022. LYNCH stated that he deleted the App from the 5805 Phone.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge and belief, the images and video described above were transported and transmitted in interstate commerce and were transported and transmitted using any means and facility of interstate and foreign commerce, including by computer, based upon, among other things, their transmission from LYNCH to another individual over the internet using an instant messaging mobile application.

8. In addition, based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described above were produced using materials that were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.