
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Edward S. Kiel
 :
 v. : Mag. No. 24-mj-15104
 :
 COREY HIPSCHER : CRIMINAL COMPLAINT

I, Charles Paddock, 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 Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.

/s/ Charles Paddock/SN

Charles Paddock, Special Agent
Federal Bureau of Investigations,
*Special Agent Charles Paddock
attested to this Complaint by
telephone pursuant to Fed. R. Crim.
P. 4.1(b)(2)(A).*

Sworn to before me and subscribed in my presence,
March 21st, 2024, Essex County, New Jersey

/s/ Edward S. Kiel/SN

Hon. Edward S. Kiel
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Sexual Exploitation of Children)

On or about January 21, 2022, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

COREY HIPSCHER,

did knowingly employ, use, persuade, induce, entice, and coerce Minor-Victim-1 and Minor-Victim-2, individuals 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, Section 2251(a).

COUNT TWO
(Receipt of Child Pornography)

On or about January 21, 2022, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

COREY HIPSCHER,

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), 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).

COUNT THREE
(Possession of Child Pornography)

On or about August 10, 2023, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

COREY HIPSCHER,

did knowingly possess material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were 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 Title 18, United States Code, Sections 2252A(a)(5)(B) and 2.

ATTACHMENT B

I, Charles Paddock, am a Special Agent with the Federal Bureau of Investigation (“FBI”). 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 criminal 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 times relevant to this Complaint:
 - a. The defendant, Corey Hipscher (“HIPSCHER”), was a resident of Lodi, Bergen County, New Jersey.
 - b. “Minor-Victim-1” was born in or around January 26, 2009.
 - c. “Minor-Victim-2,” the younger sister of Minor-Victim-1, was born in or around September 11, 2013.

2. Law enforcement has learned through investigation, including law enforcement interviews with Minor-Victim-1 and others, that in or around 2020, HIPSCHER began communicating with Minor-Victim-1, a foreign national in a different country, through a social media platform (“Platform-1”). While communicating through Platform-1, HIPSCHER began to encourage Minor-Victim-1 to take pictures of herself naked and send them to HIPSCHER.

3. Subsequently, HIPSCHER began communicating with Minor-Victim-1’s mother using a second social media platform (“Platform-2”) and began what HIPSCHER portrayed as an online romantic relationship with Minor-Victim-1’s mother.

4. After beginning a purported online romantic relationship with Minor-Victim-1’s mother, HIPSCHER continued to communicate with Minor-Victim-1, encouraging her to provide him with explicit videos and images.

5. At around this time, HIPSCHER arranged with Minor-Victim-1’s mother for the family, including the mother, Minor-Victim-1, Minor-Victim-2, and their younger brother to visit HIPSCHER in New Jersey.

6. From in or around September 2022 to in or around October 2022, the family of Minor-Victim-1, including Minor-Victim-2 and Minor-Victim-1's mother and brother, traveled from another country to New Jersey to visit HIPSCHER.

7. During this visit, law enforcement has learned that HIPSCHER took Minor-Victim-1 and Minor-Victim-2 to his apartment, where he sexually assaulted Minor-Victim-1 and took photos of Minor-Victim-1 and Minor-Victim-2 unclothed.

8. Subsequently, Minor-Victim-1 and Minor-Victim-2 returned to their home country before returning to New Jersey at some point in 2023.

9. On or about August 5, 2023, law enforcement received an allegation that HIPSCHER had sexually abused Minor-Victim-1.

10. On or about August 10, 2023, law enforcement executed a search warrant of HIPSCHER's residence. While executing the search warrant, law enforcement recovered a cellular telephone from HIPSCHER's bedside table ("Cellphone-1").

11. Cellphone-1, which law enforcement was given consent to search, was logged into an account for an end-to-end encrypted email service based outside the United States, which account used the name "chipscher" and listed HIPSCHER's phone number and email address as recovery information (the "HIPSCHER Email Account"). The HIPSCHER Email Account was also linked to an online payments system account belonging to HIPSCHER. For these reasons, I believe that the HIPSCHER Email Account was owned and controlled by HIPSCHER.

12. A lawful search of the HIPSCHER Email Account has revealed, among other things, recordings made by HIPSCHER of communications using video conferencing technology between HIPSCHER, Minor-Victim-1, and Minor-Victim-2 depicting Minor-Victim-1 and Minor-Victim-2 naked and engaging in sex acts, while HIPSCHER is recorded watching.

13. In particular, law enforcement discovered in the HIPSCHER Email Account a recording of a video call depicting Minor-Victim-1 as she inserts a bowling pin into her vagina. At the upper right corner of the video is a “picture-in-picture” video that appears to depict an adult male penis. At one point, icons that depict video call options on a cell phone are shown. The user controlling the video call options appears to select the icon permitting the user to switch between the device’s front- and rear-facing cameras, which flashes briefly indicating its selection. The “picture-in-picture” video then rotates as it appears to switch from displaying the view of the device’s rear-facing camera to the view of the device’s front-facing camera. The “picture-in-picture” video then displays HIPSCHER. The metadata of the recording indicates that it was created on or about January 21, 2022.

14. Law enforcement also discovered the following videos and images within the HIPSCHER Email Account:

- a. A folder titled “[Minor-Victim-1’s first name]>drunk”. The videos in this folder, including the video described in paragraph 10, appear to depict Minor-Victim-1, engaged in sexually explicit activity involving a bowling pin:
 - i. A recording of a video call in which Minor-Victim-1 exposes her vagina to the camera. The small end of the bowling pin is inserted into her vagina. At the upper right corner of the video is a “picture-in-picture” video that depicts HIPSCHER.
 - ii. A recording of a video call which begins by showing Minor-Victim-1’s face. The camera is then moved to focus on her vagina. At the upper right corner of the video is a “picture-in-picture” video that appears to depict an erect adult male penis being masturbated by a hand. The male ejaculates.
- b. A folder titled “[Abbreviation of Minor-Victim-2’s first name]>Vids” Folder. Among the files located in that folder is the following:
 - i. A recording of a video call in which, Minor-Victim-2 is completely nude and appears to be dancing. At the end of the video, Minor-Victim-2 poses while a light flashes. At the upper right corner of the video is a “picture-in-picture” video that appears to depict HIPSCHER.
- c. A folder titled “[Abbreviation of Minor-Victim-2’s first name]>Pics” Folder. Among the files located in that folder is the

following:

- i. A photo appears depicting Minor-Victim-2 standing beside Minor-Victim-1. Minor-Victim-2 and Minor-Victim-1 are standing completely nude in a room, which, law enforcement believes was taken in HIPSCHER's apartment based on a comparison to photos of HIPSCHER's apartment taken by law enforcement during the August 10, 2023, search.

15. 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 in Paragraphs 14(a) - (c) above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone. This is based upon, among other things, (1) the presence of images and videos on Cellphone-1; (2) the presence of the HIPSCHER Email Account on Cellphone-1; and (3) law enforcement's knowledge that HIPSCHER received these images and videos from Minor-Victim-1 and Minor-Victim-2 through video conferencing technology over the Internet.