
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Rukhsanah L. Singh
	:	
v.	:	Mag. No. 25-14023 (RLS)
	:	
DAVID TUYTJENS	:	<u>CRIMINAL COMPLAINT</u>

I, Michael Nolan Harbison, 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.

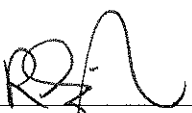
/s/ Michael Nolan Harbison
Michael Nolan Harbison
Special Agent
Federal Bureau of Investigation

Attested to me by telephone
pursuant to FRCP 4.1(b)(2)(A)
on April 22, 2025,
in the District of New Jersey

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AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ



Honorable Rukhsanah L. Singh
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Possession of Child Pornography)

On or about December 13, 2024, in Hunterdon County, in the District of New Jersey, and elsewhere, the defendant,

DAVID TUYTJENS,

did knowingly possess and attempt to possess a SanDisk UltraPlus 64GB MicroSD Card, which contained at least 800 images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, after having previously been convicted of an offense under the laws of the State of New Jersey relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, and after having previously been convicted of an offense under Chapter 110 in Title 18 of the United States Code.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

ATTACHMENT B

I, Michael Nolan Harbison, am a Special Agent with the Federal Bureau of Investigation. 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.

A. Tuytjens' Background

1. The defendant, David Tuytjens ("TUYTJENS"), has been previously convicted of sexual offenses involving minors. On or about April 19, 2002, TUYTJENS pleaded guilty in the Superior Court of the State of New Jersey, Hunterdon County, to: 1) Aggravated Sexual Assault, a first-degree offense, in violation of N.J.S.A. § 2C:14-2(a)(1); and 2) Sexual Assault, a second-degree offense, in violation of N.J.S.A. § 2C:14-2(b). On or about July 24, 2002, TUYTJENS was sentenced to 13-year term of imprisonment for the Aggravated Sexual Assault and a six-year term of imprisonment for the Sexual Assault. As part of the sentence, TUYTJENS was also subject to Community Supervision for Life ("CSL").

2. In addition, on or about August 23, 2012, TUYTJENS pleaded guilty in the United States District Court for the District of New Jersey to possession of child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2). On December 11, 2012, TUYTJENS was sentenced to 120 months' imprisonment and five years of supervised release in connection with the federal conviction.

B. The Search of Tuytjens' Residence

3. On or about December 13, 2024, officers from the New Jersey State Parole Board (the "Parole Officers") visited TUYTJENS' residence in Tewksbury, New Jersey (the "Residence") to conduct a search for Internet-capable devices, the possession of which would be in violation of the terms and conditions of TUYTJENS' CSL.

4. The Parole Officers brought with them two K9 units ("K9-1" and "K9-2," respectively), both of whom are specially trained to detect the presence of electronic devices such as laptops, USB flash drives, and MicroSD cards¹. When K9-1 or K9-2 detect the odor of an electronic device, they are trained to alert law enforcement officers.

5. TUYTJENS was present at the Residence on December 13, 2024 at the time of the Parole Officers' visit. The Parole Officers inspected the Residence using K9-1 and K9-2. Consistent with K9-1's training, K9-1 alerted Parole Officers to kitchen cabinets, a bedroom nightstand, a bedroom dresser, a living-room entertainment console, and a sitting-room desk, indicating that K9-1 detected electronic devices in those locations. The alerts by K9-1 were replicated by K9-2. In addition, K9-2 alerted Parole Officers to TUYTJENS' vehicle, indicating that K9-2 detected electronic devices located in the vehicle.

6. Following the indications from K9-1 and K9-2, the Parole Officers conducted a search of TUYTJENS' vehicle and Residence and recovered various electronic devices (listed individually below, and, collectively, the "Devices"):

Device	Location
1 USB flash drive	TUYTJENS' Vehicle
1 Lenovo Thinkpad laptop (the "Laptop")	Bedroom Dresser
1 SanDisk UltraPlus 64GB MicroSD Card	Inside Laptop
1 SanDisk UltraPlus 64GB MicroSD Card	Bedroom Nightstand
1 SD Card Adapter	
1 USB flash drive	
1 "flip phone" style cellphone	TUYTJENS' person
1 "flip phone" style cellphone	Sitting Room
1 USB flash drive	Television monitor in entertainment console
Device	Quantity
Laptop	1
USB Flash Drive	3
SanDisk UltraPlus 64GB MicroSD Card	2
SD Card Adaptor	1
Cellular phone	2

¹ A MicroSD card is a storage device for electronic files that allows a user to expand memory space otherwise available for equipment such as laptops and other personal computing devices.

C. The Search of the Devices

7. After recovering the Devices, the Parole Officers scanned each device for contraband based on the terms and conditions of TUYTJENS' CSL.

8. Parole Officers were unable to access data on the Laptop because its hard drive was encrypted. The scan of the SanDisk UltraPlus 64GB MicroSD Card located in the Laptop (the "Laptop Card") revealed images of what appeared to be child pornography as defined by Title 18, United States Code, Section 2256(8).

9. Following the scan of the Laptop Card, on or about January 22, 2025, a Judge of the Superior Court of New Jersey, Hunterdon County, on an application of probable cause, authorized a search warrant for the search of the Laptop Card.

10. Parole Officers subsequently executed the search warrant and extracted data from the Laptop Card. That extraction revealed at least 800 images and 30 video files of child pornography as defined by Title 18, United States Code, Section 2256(8).

11. In particular, images extracted from the Laptop Card depicted prepubescent minors engaged in sexually explicit conduct, images portraying sadistic or masochistic conduct, and sexual abuse or exploitation of an infant or toddler.

12. Summaries of five of the over 800 images and 30 videos include:

Filename	Description
03yo little sis sucking_preview.mp4	The video depicts a prepubescent female, approximately three years old. The prepubescent female is naked, and has an adult penis in her hands and repeatedly places mouth on penis, sucking it repeatedly over the course of the one-minute video.
100_1918.jpg	The image depicts a prepubescent female, approximately three years old. The prepubescent female is sitting on the lap of a naked adult male. The adult male's penis is visible beneath the prepubescent female. The adult male has a foreign object in one hand which is also inserted into the vagina of the prepubescent female.
Analfrontgo_Pro.mp4	The video depicts a prepubescent female, approximately five years old wearing a pink and white pajama top, blue socks, and no pants. The prepubescent female has been drugged, and has foreign object in her hand. An adult male's penis is inserted in the prepubescent female's anus. As the adult male thrusts into the prepubescent female's anus, the adult male moves the prepubescent female's hand, containing the foreign object to rub against her vagina.
Baddream – dutch girl 19.cleaned.jpg	The image depicted a prepubescent female approximately nine years old. The prepubescent female is face down, with denim skirt pulled up above her buttocks, and her hands are tied behind her back. An adult male's penis is inserted into her vagina.
DSC01235.jpg	The image depicts a prepubescent female, approximately eight years old. The prepubescent female is naked, and seated in a sex swing. Her hands are tied above her head, and her ankles are tied to a long piece of wood causing her legs to be spread and her vagina and anus fully visible.

13. Law enforcement officers also reviewed the names of various folders used to organize the photos and videos contained on the Laptop Card. These folders included names such as: "03yo," "05yo Drugged," "09yo Throat Fuck," "09yo in Cuffs," and "11yo Veronica Playing With 2 Dicks."

14. Based on my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge and belief, the images of child pornography found on the Laptop Card 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, and the images of child pornography found on the Laptop Card further were produced using materials that were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.