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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA	:	Hon. Michael A. Hammer
	:	
v.	:	Mag. No. 25-10132
	:	
JACK WILDER	:	<b>CRIMINAL COMPLAINT</b>

I, Jaclyn Duchene, 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 Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

/s/ Jaclyn Duchene

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Jaclyn Duchene, Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

*Special Agent Jaclyn Duchene attested  
to this Affidavit by telephone  
pursuant to FRCP 4.1(b)(2)(A) on  
April 30, 2025.*

/s/ Honorable Michael A. Hammer

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Honorable Michael A. Hammer  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Possession of Child Pornography)

From on or about October 23, 2022 through on or about July 23, 2024, in the District of New Jersey, and elsewhere, the defendant,

**JACK WILDER,**

did knowingly possess material that contained at least approximately three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been 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 transported in and affecting interstate and foreign commerce by any means, including by computer.

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

**COUNT TWO**  
(Enticement of a Minor)

On or about February 10, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**JACK WILDER,**

did, using any facility and means of interstate and foreign commerce, including by computer, knowingly persuade, induce, entice, and coerce and attempted to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, specifically, the production of child pornography.

In violation of Title 18, United States Code, Section 2422(b) and Title 18, United States Code, Section 2.

**COUNT THREE**  
(Enticement of a Minor)

On or about June 25, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**JACK WILDER,**

did, using any facility and means of interstate and foreign commerce, including by computer, knowingly persuade, induce, entice, and coerce and attempted to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution.

In violation of Title 18, United States Code, Section 2422(b) and Title 18, United States Code, Section 2.

## ATTACHMENT B

I, Jaclyn Duchene, am a Special Agent with the U.S. Department of Homeland Security – Homeland Security Investigations. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including documents and physical evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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. The defendant, JACK WILDER (“WILDER”), was a history teacher at a charter school in Plainfield, New Jersey, and a resident of Hoboken, New Jersey who subsequently moved to Somerville, New Jersey.

2. During this investigation, law enforcement learned that WILDER communicated with a 16-year-old male (“MINOR VICTIM-1”) using a mobile payment application.

- a. On or about February 10, 2024, WILDER sent \$1 to MINOR VICTIM-1 with a comment that included WILDER’s Snapchat username or handle. Snapchat is a mobile phone application that provides users a way to share photos, videos, and chats. WILDER’s comment to MINOR VICTIM-1 also included: “can pay a lot to give 🧠.” Based on my training and experience, I believe that the emoji 🧠 was a reference to “brain,” which is a term sometimes used to refer to oral sex.
- b. On or about February 10, 2024, MINOR VICTIM-1 sent a payment request to Wilder for \$10 with the following comment: “I charge for head body pics and dick picks.” Wilder completed the transaction, which means that Wilder transferred \$10 to MINOR VICTIM-1.
- c. On or about February 10, 2024, MINOR VICTIM-1 sent a payment request to Wilder for \$35 with the following comment: “I just charged u for pics this for head.”

3. On or about October 1, 2024, law enforcement interviewed MINOR VICTIM-1. According to MINOR VICTIM-1, in or around 2024, WILDER approached MINOR VICTIM-1 in person in Jersey City, New Jersey, and offered to pay \$100 to MINOR VICTIM-1 for sex. MINOR VICTIM-1 also stated that

WILDER offered to pay MINOR VICTIM-1 for WILDER to give MINOR VICTIM-1 oral sex. WILDER then invited MINOR VICTIM-1 to his house that night at midnight, although MINOR VICTIM-1 did not visit Wilder's residence. MINOR VICTIM-1 also explained to law enforcement that MINOR VICTIM-1 sent pictures of his genitals to WILDER in exchange for money.

4. On or about July 23, 2024, law enforcement officers lawfully stopped WILDER upon his disembarking from a flight landing at New York Stewart International Airport originating from Iceland.

5. Law enforcement officers lawfully searched a cell phone that WILDER had on his person and provided to the officers.

6. On WILDER's cell phone, law enforcement officers observed files of naked pubescent males.

7. After law enforcement informed WILDER that his cell phone may contain child sexual abuse material, WILDER waived his right to remain silent and agreed to speak with law enforcement. WILDER denied possessing child pornography and stated that he had never viewed or shared child pornography. According to WILDER, he did not communicate with minors on social media other than through his work as a teacher, and he never had any contact with any children in a sexual manner.

8. On or about November 18, 2024, law enforcement executed a search warrant on WILDER's cell phone and uncovered the following:

- a. Law enforcement observed a video of two pubescent minor males engaging in a sexual activity with each other.
  - i. In the video, one of the minor males ("MINOR VICTIM-2") performed oral sex on the other minor male ("MINOR VICTIM-3"). Approximately 45 seconds later, MINOR VICTIM-3 then began to perform oral sex on MINOR VICTIM-2.
  - ii. The video contains certain metadata such as the date the video was created and the date the video was saved to WILDER's cell phone. The metadata for this video indicates that it was created on or about March 4, 2017, and saved to WILDER's cell phone on or about October 23, 2022.

iii. Law enforcement has previously identified MINOR VICTIM-2 as a minor when the video was recorded, which is consistent with the creation date of the video putting MINOR VICTIM-2 at approximately 14 years old.

b. In addition to the video, law enforcement also observed conversations on WILDER's phone between WILDER and other individuals on Snapchat.

i. Contrary to WILDER's denial of communicating with minors on social media other than through his work as a teacher, WILDER's Snapchat account included numerous conversations with individuals who identified themselves as under the age of 18—with some claiming they were 15 years old—in the weeks leading up to the search of WILDER's cell phone at the airport described above. Many of the Snapchat conversations took a similar form in which WILDER asked the individuals' ages, where they were located, whether they were athletes, and whether WILDER could perform oral sex on them.

ii. On or about June 25, 2024, WILDER told a 17-year-old ("MINOR VICTIM-4") that WILDER would pay money to MINOR VICTIM-4 if WILDER could perform oral sex on MINOR VICTIM-4, as shown below:

<b>WILDER</b>	Yo
<b>MINOR VICTIM-4</b>	Yo
<b>WILDER</b>	Hoboken here
<b>WILDER</b>	Age?
<b>MINOR VICTIM-4</b>	Pic?
<b>WILDER</b>	Id pay to suck u
<b>WILDER</b>	If u an athlete
<b>MINOR VICTIM-4</b>	I'm not an athlete
<b>WILDER</b>	Age?
<b>MINOR VICTIM-4</b>	17
<b>WILDER</b>	Pic?
<b>WILDER</b>	Ill keep u dl
<b>MINOR VICTIM-4</b>	[Deleted chats]
<b>WILDER</b>	Wya
<b>MINOR VICTIM-4</b>	Newark
<b>WILDER</b>	How tall
<b>WILDER</b>	Bbc?
<b>MINOR VICTIM-4</b>	6'2

<b>MINOR VICTIM-4</b>	[Deleted Chat]
<b>WILDER</b>	Can I see ur body
<b>MINOR VICTIM-4</b>	\$20 I have premium snap
<b>WILDER</b>	Nah id pay to suck that's it
<b>MINOR VICTIM-4</b>	Ok then nvm
<b>MINOR VICTIM-4</b>	And btw I told you I was 17 I'm contacting law enforcement

Based on my training and experience, WILDER's reference to "dl" means "down low" and "bbc" means "big black cock." Records obtained from an internet service provider indicate that WILDER accessed his Snapchat account on or about June 25, 2024, from an apartment in Hoboken, New Jersey.

9. Based on my education, training and experience, and my discussions with other law enforcement officers and witnesses, and to the best of my knowledge and belief, the above-described communications and images were 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 were produced using materials that had been transported in and affecting interstate and foreign commerce by any means, including by computer.