

ATTACHMENT A

On or about July 8, 2018, in the special maritime and territorial jurisdiction of the United States, the defendant

JEFFREY GOLDSTEIN,

intentionally captured an image of a private area of a minor female without her consent, and knowingly did so under circumstances in which the minor female had a reasonable expectation of privacy.

In violation of Title 18, United States Code, Section 1801(a).

ATTACHMENT B

I, Maria Unanue, am a Special Agent with the Federal Bureau of Investigation. 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 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 that date.

1. On or about July 8, 2018, a cruise ship (the "Cruise Ship") embarked from Bayonne, New Jersey, and began traveling to Bermuda. The defendant JEFFREY GOLDSTEIN ("GOLDSTEIN"), a 31-year-old Hoboken, New Jersey resident, was a passenger on the Cruise Ship. That evening, a thirteen-year old girl ("Victim-1") was standing on the deck of the Cruise Ship, alongside another minor female. Victim-1 and the other minor female faced outward toward the water to watch the sun set.

2. Shortly before 8:00 p.m., GOLDSTEIN approached Victim-1. Without Victim-1's knowledge or permission, GOLDSTEIN placed his iPhone (the "iPhone") underneath the skirt of Victim-1's dress. GOLDSTEIN pointed the iPhone's camera upward toward Victim-1's private area and appeared to take a photograph of Victim-1's genitalia and buttocks, which were covered by her undergarments. At the time, Victim-1 felt something touch her leg. GOLDSTEIN moved to the side of Victim-1 and soon walked away.

3. A nearby adult ("Individual 1") observed GOLDSTEIN take a photo up Victim-1's dress. Cruise Ship personnel subsequently reviewed surveillance footage of the incident. Surveillance footage confirmed Individual 1's account. Using surveillance footage from the Cruise Ship, GOLDSTEIN was identified as the man in the footage.

4. On or about July 18, 2018, pursuant to a search warrant authorized by a Magistrate Judge in the District of New Jersey, the FBI downloaded the contents of the iPhone. A review of the iPhone revealed an image file dated July 8, 2018, which appears to depict Victim-1's private area. Specifically, the image depicts a private area covered by undergarments and other details matching the garments worn by Victim-1 on July 8, 2018. The iPhone contained approximately 42 other image files and one video that appear to depict additional "up-skirt" images.