


Signature of Judicial Officer

ATTACHMENT A

On or about June 14, 2018, in Bergen County, in the District of New Jersey and elsewhere, the defendant

BARRY GOLDSTEIN

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and 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, Section 2252A(a)(2)(A) and 2252A(b)(1) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Bradley Benwell, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. I am familiar with the facts set forth below based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. 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. Statements of others set forth below are related in substance and part, and all dates, times, and amounts are approximate.

Background

1. At all times relevant to this Complaint, defendant BARRY GOLDSTEIN was a resident of Bergenfield, New Jersey.

The Investigation

2. From in or about May 2018 through in or about August 2018, an undercover law enforcement officer (the "UC") engaged in communications over an instant messaging mobile application (the "IM App") with defendant GOLDSTEIN. The IM App uses instrumentalities of interstate communication to transmit and receive messages, photos, videos, sketches, mobile webpages, and other content after users register a username. The investigation has revealed that defendant GOLDSTEIN maintained an account on the IM App (the "defendant GOLDSTEIN IM App Account"). The defendant GOLDSTEIN IM App Account was accessed from Internet Protocol ("IP") addresses associated with defendant GOLDSTEIN's home, and defendant GOLDSTEIN used the defendant GOLDSTEIN IM App Account to share with the UC multiple files suspected of depicting child pornography.

3. In or about May 2018, after engaging in explicit conversations with the UC regarding the sexual abuse of children, defendant GOLDSTEIN sent approximately five images depicting suspected child pornography from the defendant GOLDSTEIN IM App Account to the UC via the IM App.

4. On or about June 14, 2018, defendant GOLDSTEIN sent the UC a message that contained a file storage link from the GOLDSTEIN IM App Account. The link contained numerous video files of suspected child pornography. Three of the files in the link sent by defendant GOLDSTEIN are described as follows:

FILENAME	DESCRIPTION
12YO Emma (Blowjob Adair Part 2) (Resized) (2011).mp4	This video file, approximately 34 seconds in length, depicted a prepubescent female child, approximately 9 years old, wearing a white sleep mask that had the words "cock cum slut" written on it. The child is seen performing oral sex on an adult male's penis.
466ebb8bac9bec648 37767b21ec6c4c7 (18-23) (1).mp4	This video file, approximately 48 seconds in length, depicts a prepubescent female child, approximately 8 to 9 years old, performing oral sex on an adult male's penis until her chest is ejaculated on.
2012_5yo_HDV_0156 _exclusive_trade.mp4	This video file, approximately 1 minute and 53 seconds in length, depicted a prepubescent female child, approximately 5 to 7 years old, performing oral sex on an adult male's penis until her face is ejaculated on.

5. Law enforcement officers obtained subscriber information for the defendant GOLDSTEIN IM App Account. The information revealed that the email address associated with the defendant GOLDSTEIN IM App Account is an email address associated with defendant GOLDSTEIN. Moreover, the defendant GOLDSTEIN IM App Account was accessed on or about June 14, 2018 – the date that defendant GOLDSTEIN sent the videos of suspected child pornography set forth above – from an IP address whose subscriber information includes an email address associated with defendant GOLDSTEIN and which is also linked to defendant GOLDSTEIN's residence.

6. On or about August 29, 2018, law enforcement executed a lawfully obtained search warrant at defendant GOLDSTEIN's residence in Bergenfield, New Jersey (the "Residence"). Law enforcement officers administered Miranda warnings and then interviewed defendant GOLDSTEIN. The interview was recorded. During the interview, defendant GOLDSTEIN admitted that he controlled the defendant GOLDSTEIN IM App Account. Defendant GOLDSTEIN further admitted that he used the defendant GOLDSTEIN IM App Account to distribute child pornography to the UC.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the files described in paragraph 4, above, traveled in interstate commerce because the images were transmitted over the Internet via the IM App.