

ATTACHMENT A

From on or about August 18, 2018 through on or about September 3, 2018, in Union County, in the District of New Jersey and elsewhere, the defendant,

JEFFREY SHREVE,

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, Sections 2252A(a)(2)(A), 2252A(b)(1) and 2.

ATTACHMENT B

I, Jill C. Lasseter, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. 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 the date alleged.

Background

1. At all times relevant to this Complaint, defendant JEFFREY SHREVE ("SHREVE") was a resident of Scotch Plains, New Jersey.

The Investigation

2. In or about August 2018 through in or about September 2018, undercover law enforcement officers accessed a publicly available peer-to-peer ("P2P") network over the Internet and observed that a computer with a certain Internet Protocol ("IP") address was logged into the network. The investigation revealed that this IP address was associated with a computer used by an individual later identified as defendant SHREVE. Law enforcement documented SHREVE sharing multiple files suspected of depicting child pornography.

3. From at least as early as in or around August 2018 through in or around September 2018, law enforcement downloaded numerous files containing what appeared to be child pornography via the P2P network from the computer with the IP address associated with SHREVE. For instance, from on or about August 18, 2018 through on or about September 3, 2018, law enforcement downloaded 24 video files and nine image files containing what appeared to be child pornography from SHREVE. Three of the files downloaded from SHREVE are described as follows:

FILENAME	DESCRIPTION
(1) File Name/Number: [Redacted]behind part 2 Hash Value:	This video, which was in a subfolder labeled "Gracel & Rona," runs approximately 1 minute and 4 seconds in length. The video shows a prepubescent girl who appears to be of Asian descent

FILENAME	DESCRIPTION
Not captured	with long black hair in a white bandana and to be between approximately 8 and 10 years of age. She is on all fours on top of a bed covered by a white sheet with an adult standing behind her penetrating her vaginally. This video was downloaded by law enforcement during a session lasting between approximately 12:25 a.m. and 9:38 a.m. on or about August 18, 2018.
<p>(2) File Name/Number:</p> <p>Pthc – Little [Redacted] Film!!!.avi</p> <p>Hash Value:</p> <p>Not captured</p>	<p>This video, of which only 2 seconds was downloaded by law enforcement, is 4 minutes and 17 seconds in length if fully captured. It was in a subfolder labeled “Gracel & Rona.” The segment successfully downloaded shows a black screen with the words “Little Rona” displayed in black letters outlined in orange, followed by a video clip depicting a naked girl who appears to be between approximately 5 and 7 years of age seated on a reddish-pink couch performing fellatio on a naked adult male standing in profile facing toward the girl. This video was downloaded by law enforcement during a session lasting between approximately 12:25 a.m. and 9:38 a.m. on or about August 18, 2018.</p>

FILENAME	DESCRIPTION
<p>(3) File Name/Number: C336d6604[Redacted] vaginal</p> <p>Hash Value: fbc80a05a3d91ea788e59c231286518</p>	<p>This video, of which law enforcement successfully downloaded only one second, was in a folder labeled "cpack2_milky_rivers" and a subfolder labeled "hmm," and further within a subfolder labeled "michelle." The segment successfully downloaded depicts a naked Asian girl approximately 3 to 4 years in age seated on an off-white plastic chair positioned in front of a white wall. The girl performs fellatio upon an adult male who is standing in profile wearing a dark green shirt with long white sleeves. This video was downloaded by law enforcement during a session lasting between approximately 9:37 a.m. on or about August 18, 2018 to approximately 1:11 p.m. on or about September 3, 2018.</p>

4. On or about March 12, 2019, law enforcement executed a search warrant at SHREVE's residence in Scotch Plains, New Jersey (the "residence"). At the residence, law enforcement discovered computer storage devices belonging to SHREVE. A preliminary forensic review of the devices revealed files that depicted images of child erotica.

5. 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 3 above traveled in interstate commerce, that is, the images were downloaded from the Internet via the P2P network, based upon, among other things, their presence on defendant SHREVE's electronic devices and law enforcement's knowledge that defendant SHREVE has shared these images on an internet-based P2P network.