
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
 :
 v. : Mag. No. 19-4450
 :
 JOHN SCHULENBURG : **CRIMINAL COMPLAINT**
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I, Stephen J. Jamison, 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 Federal Bureau of Investigation ("FBI"), assigned to the Newark Division, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Stephen J. Jamison, Special Agent
Federal Bureau of Investigation

November 6, 2019
Date

at Essex County, New Jersey
County and State

Honorable Michael A. Hammer
United States Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

Count 1 – Distribution of Child Pornography

On or about July 1, 2019, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JOHN SCHULENBURG,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce and that had been mailed, and had been 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).

Count 2 – Possession of Child Pornography

On or about November 6, 2019, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JOHN SCHULENBURG

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means and 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 mailed, 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)(5)(B) and 2.

ATTACHMENT B

I, Stephen J. Jamison, am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the Newark Division. I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, 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 John Schulenburg ("SCHULENBURG") was a resident of Basking Ridge, New Jersey.

The Investigation

2. In or around July 2019, law enforcement conducted an undercover online session (the "2019 Session") using a publicly-available peer-to-peer ("P2P") software application program (the "P2P Program"). P2P is a method of communication available to Internet users through the use of special software. The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together. Generally, when P2P software is installed on a computer, the user is directed to specify a "shared" folder. All files placed in that user's "shared" folder are available to anyone on the world wide network for download. A person interested in sharing child pornography with others in the P2P network need only place those files in his or her "shared" folders. Those child pornography files are then available to all users of the P2P network for download regardless of their physical location. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce.

3. The P2P Program allowed users to connect to and share, search and download content. The version used by law enforcement allows law enforcement to determine the IP address through which target computers access the Internet.

4. During the 2019 Session, a computer user (the "Computer") shared multiple files of child pornography using the P2P Program. The undercover law enforcement officer established a direct connection to the Computer. Several of the files being shared by the Computer had a hash value that has been identified to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the 2019 Session by the Computer using a particular IP

Address (“IP Address 1”). Hundreds of images of child pornography were available from the IP Address 1, which other users accessing the P2P Network could download. Indeed, during the 2019 Session, law enforcement downloaded more than 235 files containing child pornography from the Computer, which was utilizing IP Address 1. The image files included multiple visual depictions of pre-pubescent children engaged in sexual acts with adults, including the following representative sample:

Filename	Description
Lsm14-08-103.jpg	This is a color image of two naked Caucasian prepubescent females, both with long light brown/blondish hair, in an outdoor setting with green trees in the background. The female in the front is lying back on what appears to be a green rug or blanket. She has what appears to be a soda bottle with a red and white label in her hands holding it up to her mouth. Her legs are spread apart, exposing her vagina. The second female is sitting directly behind the first female with her legs spread apart and looking down at the first female. There is a multi-colored umbrella leaning on the ground directly behind the two females. “LS-MAGAZINE,” a well-known child pornography internet photo series, is displayed in the upper left corner of the image.
Lhv-030-109.jpg	This is a color image of a naked Caucasian prepubescent female with brown hair. She is lying on her back on what appears to be a red-colored piece of cloth. She has what appears to be fake multi-colored flowers and green leaves in the background of the image. She has a green leaf with a pink, gold and purple-colored ribbon-like material on her stomach. Her legs are spread apart, exposing her vagina. “LS MODELS,” a well-known child pornography internet photo series, with additional wording in a circular pattern is displayed in the upper right corner of the image.
Lsm15-08-093.jpg	This is a color image of two naked Caucasian prepubescent females with

	<p>brown hair. The first female is sitting against a white wall, straddling a light tan-colored table. The second female is sitting directly in front of the first female, also straddling the table, exposing her vagina. She is covering her chest with her hands while the first female is wrapping her arms around the second female's stomach. There are cherries and an apple on the table. The apple appears to have been bitten. There is a yellow-colored cabinet in the background with a silver handle and a blue and white towel sitting on the countertop. "LS-MAGAZINE," a well-known child pornography internet photo series, is displayed in the upper right corner of the image.</p>
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5. IP Address 1 was assigned, at the approximate times of the 2019 Session, to an account registered to defendant SCHULENBURG's residence.

6. On or about November 6, 2019, law enforcement executed a search warrant at SCHULENBURG's residence in Basking Ridge, New Jersey. During the search of the residence, SCHULENBURG's wife asked SCHULENBURG, in sum and substance, what "this" was about. SCHULENBURG responded, in sum and substance, that it was about the "same as before." SCHULENBURG had previously, on or about September 17, 2013, pled guilty to knowingly possessing, viewing, and/or having under his control, an item depicting the sexual exploitation or abuse of a child, in violation of N.J.S.A. 2C:24-4b(5)(B). At the time of SCHULENBURG's statement, law enforcement had not informed him of the basis for the Search Warrant or the visit.

7. During the search of the residence, law enforcement stated to SCHULENBURG, in sum and substance, "you know why we are here," and asked SCHULENBURG, in sum and substance, if he could "at least tell us where it is." SCHULENBURG responded, in sum and substance, that it was in a silver computer and pointed to a room in his residence.

8. A preliminary forensic review of a silver laptop seized from the room indicated by SCHULENBURG (the "Silver Laptop") revealed over one hundred files titled with names indicative of child pornography. Law enforcement reviewed several of the images which were indicative of child pornography, as defined by Title 18, United States Code, Section 2256(8), including the below described and named files:

Filename	Description
49.jpg	This image appears to depict an adult male wearing only dark shorts with his erect penis protruding from his shorts. A naked prepubescent female child with blond hair is on his lap. His left hand is around the back of her neck and his right hand is holding her at her right thigh near her vagina. The child's hands are near her vagina. The male's right hand and the child's hands are spreading her vagina.
IMG_20190805_134233_245.jpg	This image appears to depict a prepubescent naked female child with wet hair on top of a naked adult male. The male is lying on his back and the child's vagina is on top of his erect penis. Her hands are on his chest and her legs are straddling his torso with her feet next to his legs.
rape 8 boy 6 girl.3gp	This video appears to depict a prepubescent boy and prepubescent girl in a bathroom. The girl has a shirt draped over her head and underwear pulled down to her knees. She is leaning over a toilet. The boy is behind the girl with his hands on her hips. He is wearing a shirt and his pants are pulled down to his upper thighs. He appears to be penetrating the girl's vagina. He slaps her on the buttocks. The girl tells the boy that it hurts and to stop. She later tells the boy she is going to tell her mommy if he doesn't stop. This video is approximately 12 seconds.

9. A preliminary forensic review of the Silver Laptop also identified P2P filing sharing software that would allow SCHULENBURG to share files on the Network, as described in paragraph 4.

10. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography files described in paragraphs 4 and 8 above, traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any

means, including by computer, that is, the images were downloaded from and transmitted via the Internet.