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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor, U.S.M.J.  
 :  
 v. : Mag. No. 20-  
 :  
 CHRISTIAN IMPORTUNA : **CRIMINAL COMPLAINT**  
 :  
 :

I, Kevin Matthews, 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, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.



Kevin Matthews, Special Agent  
Federal Bureau of Investigation

Special Agent Matthews attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

March 25, 2020  
Date

at New Jersey  
State

Honorable Cathy L. Waldor  
United States Magistrate Judge  
Name and Title of Judicial Officer

Cathy L. Waldor / km  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
**(Production of Child Pornography)**

In or around March 2020, in the District of New Jersey, and elsewhere, the defendant,

CHRISTIAN IMPORTUNA,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and Title 18, United States Code, Section 2.

**COUNT TWO**  
**(Distribution of Child Pornography)**

On or about March 24, 2020, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

CHRISTIAN IMPORTUNA,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), 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).

## ATTACHMENT B

I, Kevin Matthews, am a Special Agent with the Federal Bureau of Investigation ("FBI"). 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.

1. At all times relevant to this Complaint, defendant Christian Importuna ("IMPORTUNA") was a resident of Englishtown, New Jersey.
2. In or around March 2020, the FBI, Fort Wayne, Indiana, Resident Office, commenced an investigation to identify subjects involved in the online sexual exploitation of minors. As part of this investigation, an undercover agent (the "UCA") with the FBI assumed an online profile.
3. On or about March 24, 2020, IMPORTUNA approached the UCA online and engaged the UCA in a digital conversation, via an online messenger application. IMPORTUNA began the conversation by asking the UCA if he wanted to trade "CP," referring to child pornography. During the conversation, IMPORTUNA also explained that he had "homemade" images of child pornography.
4. During the conversation, IMPORTUNA sent two videos constituting child pornography to the UCA (hereinafter "Subject Video-1" and "Subject Video-2", collectively the "Subject Videos"). IMPORTUNA suggested that the Subject Videos had been taken recently. Business records indicate that IMPORTUNA sent the Subject Videos from his residence in Englishtown, New Jersey and the UCA received the videos in the State of Indiana. Descriptions of the videos are as follows:
  - a. Subject Video-1 is approximately 18 seconds long. Subject Video-1 depicts an adult male standing with his penis exposed, with the camera angled down towards his penis. A minor female child, who appears to be approximately 5-8 years old, can be seen performing oral sex on the adult male. While the minor female child is performing oral sex, the adult male can be heard giving the minor female child specific instructions and commands about the ways in which he wants her to perform oral sex. The minor female child appears to follow the adult male's instructions. The adult male's left hand is

visible throughout the video as he uses it to hold his penis. The adult male's left hand has several visible tattoos that are distinct.

- b. Subject Video-2 is approximately 10 seconds long. Subject Video-2 contains an adult male, touching a minor female child who appears to be sleeping. The video shows the adult male, rubbing the minor female child's vagina over her underwear. The video also shows the adult male's exposed penis on the minor female child's hand. The minor female child could possibly be the same minor female child from Subject Video-1. There is a tattoo of what appears to be the Monopoly man, and several other distinct markings, on the adult male's right forearm.

5. During the remainder of the conversation, IMPORTUNA advised UCA that it was, in fact, him in the Subject Videos. IMPORTUNA also explained the circumstances under which IMPORTUNA had access to the minor female child. In addition, IMPORTUNA solicited the UCA to allow him to communicate through a web-based application with a minor female child under the UCA's care.

6. Law enforcement's investigation revealed that on or about March 24, 2020, the online account used by IMPORTUNA to send the Subject Videos had only been accessed by one IP Address. The investigation further revealed that that IP Address, at all relevant times, was associated with IMPORTUNA'S residence in Englishtown, New Jersey.

7. During the investigation, law enforcement lawfully acquired multiple digital photographs of IMPORTUNA. One such photo depicts a distinct "skull" tattoo on IMPORTUNA'S left hand – this tattoo appears to be identical to the tattoo on the left hand of the adult male in Subject Video-1, referenced above. Another such photo shows a distinct tattoo on IMPORTUNA'S right hand and wrist – this tattoo appears to be identical to the tattoo on the right hand of the adult male in Subject Video-2, referenced above.

8. As such, law enforcement believes that IMPORTUNA is the adult male who sexually assaulted the minor female child in the Subject Videos, that IMPORTUNA filmed or recorded the sexual assaults, and that IMPORTUNA subsequently disseminated the Subject Videos, both of which he transmitted in interstate commerce.