
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Tonianne J. Bongiovanni
:
v. : Mag. No. 20-3024
:
JOSEPH J. PUNDERSON : CRIMINAL COMPLAINT

I, Brian Teague, being duly sworn, state that 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 Department of Homeland Security, Homeland Security Investigations, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

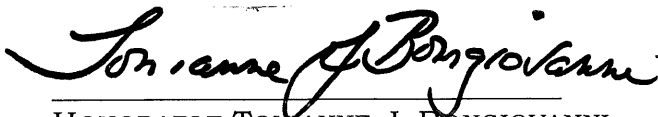
continued on the attached pages and made a part hereof.

s/ Brian Teague

Brian Teague, Special Agent
Department of Homeland Security
Homeland Security Investigations

Attested to me by telephone,
pursuant to FRCP 4.1(b)(2)(A),

June 24, 2020, at
Trenton, New Jersey



HONORABLE TONIANNE J. BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE

RECEIVED

JUN 24 2020

AT 8:30 M
WILLIAM T. WALSH
CLERK

ATTACHMENT A

COUNT ONE

From in or about May 2019 to in or about June 2020, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

JOSEPH J. PUNDERSON,

did knowingly receive 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 Title 18, United States Code, Section 2.

COUNT TWO

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

JOSEPH J. PUNDERSON,

did knowingly possess and attempt to possess material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

ATTACHMENT B

I, Brian Teague, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. Accordingly, I have personal knowledge of the facts set forth below. Because this criminal complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this complaint are related in sum and substance and in part, and all dates and figures are approximate.

1. At all times relevant to this Complaint, defendant JOSEPH J. PUNDERSON ("PUNDERSON") was a resident of Island Heights Borough, located in or around Ocean County, New Jersey.

2. In or around January 2020, law enforcement agents from the Department of Homeland Security, Homeland Security Investigations ("HSI") received multiple leads from the National Center for Missing and Exploited Children ("NCMEC") regarding the possible distribution, receipt, and/or possession of child pornography. Upon further investigation, law enforcement obtained evidence that an Internet Protocol address (the "Punderson IP Address") assigned to an Internet Service Provider account registered to an address in or around Island Heights Borough, New Jersey (the "Punderson Residence"), had been used in the commission of federal child pornography offenses between in or around May 2019 and November 2019. Further investigation revealed that e-mail and social media accounts associated with defendant PUNDERSON (the "Punderson Accounts") used and were linked to accounts that had used the Punderson IP Address assigned to the Punderson Residence in the commission of the suspected child pornography offenses.

3. Based on information provided by NCMEC and further investigation conducted by HSI, law enforcement obtained a search warrant for the Punderson Residence, which law enforcement executed on or about June 24, 2020. At the time of the search, defendant PUNDERSON was present at the Punderson Residence and provided a voluntary statement to law enforcement. During that statement, defendant PUNDERSON admitted, among other things, that he was the user of the Punderson Accounts, that he had viewed and downloaded images of child pornography from the internet, and that some of those images of child pornography would be found in the downloads folder of his tablet computer, located in his bedroom within the Punderson Residence.

4. While executing the search of the Punderson Residence pursuant to the search warrant, law enforcement seized and then searched a tablet computer found in PUNDERSON's bedroom. In the downloads folder, law enforcement located over 100 images and videos containing child pornography, including images and videos depicting prepubescent minors engaged in sexually explicit conduct. The images and videos included, by way of example:

a. A file named "35m1.avi," created May 15, 2019, which is a video file of approximately thirty-five minutes and one second in duration. The video depicts a naked prepubescent male and female on a webcam in a room. The prepubescent male is seen rubbing the prepubescent female's vagina and buttocks. The prepubescent female is then seen performing fellatio on the prepubescent male.

b. A file named "7gh.avi," created June 3, 2019, which is a video file of approximately five minutes and twenty-five seconds in duration. The video depicts a prepubescent female in a bedroom wearing a short skirt exposing her buttocks and a blue top. The prepubescent female removes her underwear and lays on a bed exposing her anus and vagina. The prepubescent female is then seen masturbating.

c. A file named "2019_shy_innocent_jbs_nude_bating_aak.avi," created April 30, 2020, which is a video file of approximately twelve minutes and twenty-nine seconds in duration. The video depicts a prepubescent female laying on a bed wearing pajamas. The prepubescent female first exposes her chest and then removes her pajama pants. The prepubescent female then exposes her vagina and anus and is seen masturbating.

5. Based upon PUNDERSON's admission that the images and videos were downloaded from the internet, the presence of the images and videos in the downloads folder of PUNDERSON's tablet computer, my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge and belief, the images and videos described above were transported and transmitted in interstate commerce and were transported and transmitted using any means and facility of interstate and foreign commerce, including by computer.

6. In addition, based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described above were produced using materials that were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.