
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Edward S. Kiel, U.S.M.J.
 :
 v. : Mag. No. 22-15142
 :
 ROBERT H. CONRAD : **CRIMINAL COMPLAINT**
 :
 :

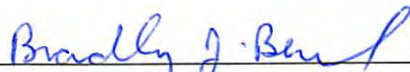
I, Bradley J. Benwell, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Bradley J. Benwell, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

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

June 15, 2022
Date

in the District of New Jersey
County and State

Honorable Edward S. Kiel
United States Magistrate Judge
Name and Title of Judicial Officer

Edward S. Kiel BJB
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Receipt of Child Pornography)

From on or about November 26, 2021 through on or about March 26, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

ROBERT H. CONRAD,

did knowingly receive 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)(A) and Section 2.

COUNT TWO

(Distribution of Child Pornography)

From on or about November 26, 2021 through on or about March 26, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

ROBERT H. CONRAD,

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).

ATTACHMENT B

I, Bradley J. Benwell, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). 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 Robert H. Conrad ("CONRAD") was a resident of Roselle, New Jersey.

The Investigation

2. From on or about November 26, 2021 through on or about March 26, 2022, law enforcement conducted an undercover online session (the "2021/2022 Sessions") 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 worldwide 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 2021/2022 Sessions, a computer user shared multiple files of child pornography using the P2P Program from a certain IP address (the "Target IP Address"). The undercover law enforcement officer established a direct connection to the Target IP Address. Several of the files being shared by the Target IP Address 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 2021/2022 Sessions by a device using the Target IP Address. Video files and images of child pornography were

available from the Target IP Address, which other users accessing the P2P Network could download.

5. Indeed, during the 2021/2022 Sessions, more than 175 media files containing child pornography were available from the Target IP Address. The files included multiple visual depictions of pre-pubescent children engaged in sexual acts with adults, including the following representative sample:

FILE NAME	DESCRIPTION
File Name/Number: PTHC 11 yo bondage Hash Value: 515DA864F2466C9A119EA40B9E E2318C	This video is approximately three minutes and 22 seconds in length and depicts a prepubescent girl engaged in sadomasochist sexual activity. The video begins with a naked prepubescent girl, who is approximately eight to ten years old, standing as she faces the camera. As the camera pans down, she drops a pink towel which had been wrapped around her hips to reveal her exposed vaginal area. At approximately 0:11, she is seen seated upon a wooden stool, with her legs spread apart as she uses her hands to spread apart her vagina for the camera. At approximately 0:21, she is seen standing in profile with cords tied around her undeveloped breasts. The cords are also attached to a necklace she is wearing. This is quickly followed by a segment showing her in a standing position with her arms extended above her head. Her wrists are bound by white rope which is attached to the ceiling of an unfinished room. At approximately 1:21, the girl is restrained by these ropes and with the cords around her chest. An adult man wearing a white tee shirt is positioned behind her such that his head is obscured. He is wrapping his arms around her and stimulating her vagina with both hands. At approximately 2:04, she is lying on her back, tied to a bench. The man, who is visible only from the mid-abdomen, is standing behind her and

	<p>placing his erect penis into her mouth. The girl, whose head is now visible thus showing that she has medium length brown hair, is wearing a red colored mask over her eyes. This video file was downloaded by law enforcement during a session lasting between approximately 2:57 p.m. and 2:59 p.m. on or about November 27, 2021.</p>
<p>File Name/Number: (pthc) dad and cumming in toddler Hash Value: D241F50B0F8326270006900443F78AD0</p>	<p>This video is approximately six minutes and 39 seconds in length and depicts an adult man engaged in vaginal intercourse with a prepubescent girl. The video is shot in a very tight closeup of the torso of the prepubescent girl who is naked and has her legs spread exposing her vaginal area. At approximately 0:15, the man inserts his erect penis into the vagina of the girl. At approximately 2:47, the man removes his penis from the girl's vagina and begins rubbing it against her vaginal and anal areas. At approximately 3:56 of the video, the man ejaculates onto the girl's leg, stomach, chest, and vagina. For the remainder of the video, the camera pans around the girl's anus and vagina focusing on the man's semen. This video file was downloaded by law enforcement during a session lasting between on or about November 27, 2021 at approximately 3:52 p.m. and on or about November 28, 2021 at approximately 9:38 p.m.</p>
<p>File Name/Number: cambodia- 12 yo fucked hard Hash Value: unknown</p>	<p>This incomplete video is approximately 25 seconds in length and depicts a prepubescent girl engaged in oral sex with a hooded adult man. The girl is visible from her waist to her head and wears a white shirt that is pulled up over her breasts. The man male is naked except for a black mask that covers his head. The first eight seconds of the video consist of the girl engaged in oral sex with the man who is lying on his back. At</p>

	<p>approximately 0:12, the girl places her face against the man's genital area. At approximately 0:20, the man gets up from his back and positions the girl onto her back. The video ends with the man getting on top of the girl. This video file was downloaded by law enforcement during a session lasting between approximately November 27, 2021 at 3:52 p.m. and November 28, 2021 at approximately 9:38 p.m.</p>
<p>File Name/Number:</p> <p>unknown</p> <p>Hash Value:</p> <p>815628F5C6D7198A43C30A0F956CC178</p>	<p>This video is approximately one minute and 50 seconds in length and depicts a prepubescent girl engaged in various sex acts with an adult man. This video begins with both individuals lying on a bed with a pink and white blanket. The man is fully naked and the girl is clad only in a pair of green underwear. The man has his arm around the girl and repeatedly kisses her while she rubs his erect penis with her right hand. At approximately 1:12, the girl begins performing oral sex on the man while he lies on the bed and smokes a cigarette. This continues for the rest of the video. This video file was downloaded by law enforcement during a session lasting between on or about March 26, 2022 at approximately 9:45 p.m. and on or about March 27, 2022 at approximately 10:39 a.m.</p>

6. The Target IP Address was assigned, at the approximate times of the 2021/2022 Sessions, to an account registered to CONRAD at his Roselle, New Jersey residence (the "Residence").

7. On or about June 15, 2022, law enforcement executed a search warrant at the Residence.

8. During the search of the Residence, law enforcement seized, among other things, a desktop computer located in the attic (the "Desktop Computer"), to which stories detailing sexual intercourse with underage children were saved.¹ After being advised of and waiving his *Miranda* rights in writing, CONRAD made a recorded statement. He told law enforcement, in sum and substance, that he had previously downloaded but had since deleted the P2P program and used the P2P Program to download and view images and videos depicting child pornography.¹ Conrad further explained, in sum and substance, that he understood that, by using the P2P Program to download and view images and videos depicting child pornography, he was also using the P2P program to share files containing child pornography with other P2P Program users.

9. 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 Paragraph 5, 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 and or videos were downloaded from and transmitted via the Internet.

¹Forensic examination of the Desktop Computer and other electronic devices lawfully recovered from the Residence is ongoing.