

UNITED STATES DISTRICT COURT

for the

DISTRICT OF NEW JERSEY



United States of America

v.

BRIAN J. MCKAY

Case No. Mag. No. 17-5515 (KMW)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov. 1, 2016 and Feb. 15, 2017 in the county of Burlington in the
District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

Counts 1 and 3: Title 18, United
 States Code, Section 2252A(a)(2)
 (B) & (b)(1)

Distribution of child pornography – i.e., knowingly distributing material
 containing child pornography in and affecting interstate or foreign commerce.

Counts 2 and 4: Title 18, United
 States Code, Section 2252A(a)(2)
 (B) & (b)(1)

Conspiracy to distribute child pornography.

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.

Complainant's signature

Kevin P. Matthews, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/21/2017City and state: Camden, New Jersey

Judge's signature

Hon. Karen M. Williams, U.S. Magistrate Judge

Printed name and title

THE UNIVERSITY OF CHICAGO

THE PLAN DOCUMENT

10-10-1964

Isolation of the *in vitro* and *in vivo* hydrolyzed fractions and their effect on the release of the active ingredient is presented in Table 1. The results show that the hydrolyzed fractions of the *in vitro* and *in vivo* hydrolyzed fractions of the active ingredient are released in a similar manner.

Approximate relative abundance of γ -irradiated

(S) 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676,

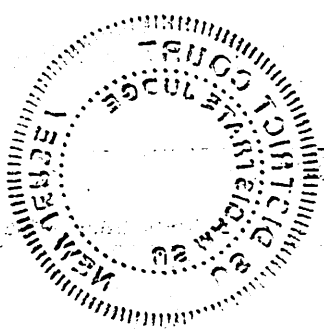
that had been based on the notion that the

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• **Chlorophyll** is the green pigment in plants that captures light energy for photosynthesis.

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CONTENTS APPROVED

UNITED STATES ATTORNEY

By: /s/ Justin C. Danilewitz
Assistant U.S. Attorney Justin C. Danilewitz
Date: April 21, 2017

ATTACHMENT A

Count 1 (Distribution of Child Pornography)

On or about November 1, 2016, in Burlington County, in the District of New Jersey and elsewhere, defendant

BRIAN J. MCKAY

did knowingly and intentionally distribute material containing child pornography using a means or facility of interstate or foreign commerce, and that affected interstate or foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code, namely the possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & (b)(2), and the distribution of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2) & (b)(1).

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).

Count 2 (Conspiracy to Distribute Child Pornography)

On or about November 1, 2016, in Burlington County, in the District of New Jersey and elsewhere, defendants

BRIAN J. MCKAY, and
CHRISTOPHER D. ROFFLER

did knowingly and intentionally conspire with each other to distribute material containing child pornography using a means or facility of interstate or foreign commerce, and that affected interstate or foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code, namely the possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & (b)(2), and the distribution of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2) & (b)(1).

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).

Count 3
(Distribution of Child Pornography)

On or about February 15, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

BRIAN J. MCKAY

did knowingly and intentionally distribute material containing child pornography using a means or facility of interstate or foreign commerce, and that affected interstate or foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code, namely the possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & (b)(2), and the distribution of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2) & (b)(1).

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).

Count 4
(Conspiracy to Distribute Child Pornography)

On or about February 15, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendants

BRIAN J. MCKAY, and
JORDAN T. ALLEN

did knowingly and intentionally conspire with each other to distribute material containing child pornography using a means or facility of interstate or foreign commerce, and that affected interstate or foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code, namely the possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & (b)(2), and the distribution of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2) & (b)(1).

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).