

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

LONNIE YOUMANS,

Defendant.

25 mj 1414

COMPLAINT

Violations of 18 U.S.C.
§§ 2251(a), (e), and
2252A(a)(2)(B), (a)(5)(B),
(b)(1)

COUNTIES OF OFFENSE:
ORANGE and ULSTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

EMILY ROKITOWSKI, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE
(Possession of Child Pornography)

1. On or about April 29, 2025, in the Southern District of New York and elsewhere, LONNIE YOUMANS, the defendant, knowingly possessed and accessed with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, YOUMANS, while in Orange County, New York, possessed sexually explicit images and videos of minors including images and videos of prepubescent minors and minors who had not attained 12 years of age.

(Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).)

COUNT TWO
(Sexual Exploitation of Children)

2. On or about January 2, 2024, in the Northern District of New York and elsewhere, LONNIE YOUMANS, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live 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 and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted

using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, using electronic chat messages, LONNIE YOUMANS, while in Ulster County, New York, induced a 15-year-old minor ("Victim-1") to engage in sexually explicit conduct, photograph the conduct and transmit the photograph over the Internet to YOUMANS.

(Title 18, United States Code, Sections 2251(a) and (e).)

COUNT THREE
(Receipt and Distribution of Child Pornography)

3. On or about January 1, 2024, in the Northern District of New York and elsewhere, LONNIE YOUMANS, the defendant, knowingly received and distributed material containing child pornography using a 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, to wit, LONNIE YOUMANS, while in Ulster County, received and distributed files containing sexually explicit images of a minor over the internet.

(Title 18, United States Code, Sections 2252A(a)(2)(B) and (b)(1).)

The bases for my knowledge and for the foregoing charge is, in part, as follows:

4. I am a Special Agent with the FBI, currently assigned to the FBI's New York Field Office. I have been a Special Agent since June 2022. Before then, starting in September 2019, I was an Intelligence Analyst with the FBI. I have participated in several investigations into the production, receipt, possession, and/or distribution of child pornography by electronic means. I have gained experience in these areas through training and work related to conducting these types of investigations. As part of my duties, I have participated in the review of electronic evidence and the execution of search warrants for social media accounts, among other types of accounts.

5. I have been personally involved in the investigation of this matter, and I am familiar with the information contained in this Complaint based on my own personal participation in the investigation, my review of documents, conversations I have had with other law enforcement officers about this matter, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included the details of every aspect of the investigation. Where actions, conversations, and statements of others are related herein, they are related in substance and in part, except where otherwise indicated.

6. As set forth in greater detail below, I have learned that, LONNIE YOUMANS, the defendant—through a calculated scheme of "grooming,"¹ manipulation, and abuse—received and distributed child pornography, including on an internet messaging application called "Discord."

¹ Based on my training and experience, "grooming" (also known as "sexual grooming") refers to a course of conduct aimed at establishing an emotional connection with a victim—usually a minor under the age of consent—to make them more open and vulnerable to sexual abuse.

Definitions and Technical Background

7. The following terms have the indicated meaning in this Complaint:

a. The terms “minor,” “sexually explicit conduct,” and “visual depiction,” as used herein, are defined as set forth in Title 18, United States Code, Section 2256.

b. The term “child pornography,” as used herein, is a visual depiction of a minor involved in sexually explicit conduct as defined in Title 18, United States Code, Section 2256 (8).

c. “Computer” means an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device. See 18 U.S.C. § 1030(e) (1).

8. Based on my training, experience, and information related to me by other law enforcement agents, I know the following:

a. An Internet Protocol (“IP”) address is a unique numeric address used to identify a particular computer connected to the Internet. An IP address looks like a series of numbers separated by periods. Every computer connected to the Internet must be assigned an IP address so that communications from or directed to that computer are routed properly.

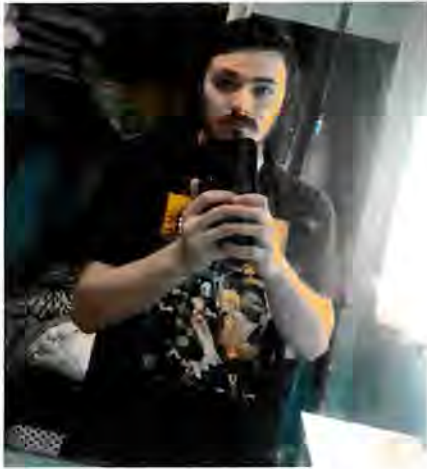
b. The Internet is a global network of computers and other devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when devices communicating with each other are in the same state.

YOUMANS’ Discord Account

9. Based on information received pursuant to a search warrant for the Discord account with username “Zenheatsu,” I have learned the following information, in substance and in part, which I submit establishes probable cause to believe that the Discord user “Zenheatsu” is LONNIE YOUMANS, the defendant:

a. In conversations with several Discord users, “Zenheatsu” identified himself as “Lonnie,” and, at one point, stated that he would be turning twenty-one years old in March 2024. Based on information received from law enforcement databases, YOUMANS’ twenty-first birthday was in March 2024.

b. Zenheatsu sent several Discord users the following picture of himself (shown below on the left), which, law enforcement officers with the Town of Wallkill Police Department (“WPD”) identified as being a photo of YOUMANS. Also, based on my review of New York state motor vehicle records for YOUMANS, the aforementioned picture appears to be of the same person as depicted in YOUMANS’ DMV records (shown below on the right):



c. Subscriber information obtained in April 2024 for the Zenheatsu account listed a phone number ending in 9480 (the “9480 Number”) associated with the account. Based on law enforcement interviews with YOUMANS’ mother, she informed agents that the 9480 Number belongs to YOUMANS.² As discussed below, YOUMANS confirmed that he used the 9480 Number—until he changed his phone and starting using a phone number ending in -3666 (the “3666 Number”).

d. IP address information for the Zenheatsu account showed that the account was accessed from the IP address during the period from on or about August 2, 2023, to on or about February 20, 2024: 67.245.223.101. Documents received from Charter Communications Inc. for IP address 67.245.223.101 showed that the IP address was assigned to a woman with the last name “Youmans,” who is believed to be YOUMANS’ cousin, with the internet service location being an address in Kerhonkson, New York, in the Southern District of New York (the “Kerhonkson Address”). On or about November 20, 2024, law enforcement officers visited the Kerhonkson Address, spoke with an individual who resides at that address, and that individual confirmed that YOUMANS has lived at that address for significant periods in the past. Additionally, based on my review of documents received from Snap Inc. pursuant to a subpoena, a Snapchat account associated with the same birthdate and email address believed to belong to YOUMANS lists that the account was accessed from the Kerhonkson Address on or about January 3, 2024.

e. IP address information for the “Zenheatsu” account showed that the account was accessed from the IP address 69.206.208.195 during the period from on or about February 20, 2024, to on or about June 8, 2024. Documents received from Charter Communications Inc. for IP address 69.206.208.195 showed that the IP address was assigned to a woman (“Individual-1”), with the internet service location being an address in Middletown, New York, in the Southern District of New York (the “Middletown Address”). On or about July 30, 2024, law enforcement interviewed the landlord of the Middletown Address, who confirmed that Individual-1 rented the

² Subscriber information obtained from T-Mobile for the 9480 Number does not list a subscriber name.

address, subleased it to someone named “Lonnie Youmans,” and that “Lonnie Youmans” had moved out of the apartment on or around June 8, 2024.

f. IP address information for the “Zenheatsu” account showed that the account was also accessed from the IP address 47.230.140.9 during the period from on or about June 22, 2024, to on or about August 20, 2024. Based on information received from YOUMANS’ relative, I understand that YOUMANS resided in Kingston, New York, in the Northern District of New York (the “Kingston Address”) from on or about June 8, 2024, to on or about September 1, 2024.

g. IP address information for the “Zenheatsu” account showed that the account was accessed from the IP address 69.206.140.99 during the period from on or about September 9, 2024, to on or about October 7, 2024. Documents received from Charter Communications Inc. for IP address 69.206.140.99 showed that the IP address was assigned to an address in Newburgh, New York, in the Southern District of New York (the “Newburgh Address”). Subscriber information for the account showed a subscriber name of “Lonnie Youmans.” On or about October 16, 2024, law enforcement officers with the Town of Newburgh Police Department went to the Newburgh Address and found YOUMANS and his mother. They told law enforcement that they had been living at the location since on or about September 1, 2024.

h. Although YOUMANS used Discord, he is believed to have primarily trafficked in child pornography via Telegram in order to evade Discord’s content restrictions. For example, in a conversation with one user believed to be a minor in which he solicits child pornography, YOUMANS asks “Can you add me on telegram again . . . I found more of the stuff you like.” Then, when asked by the minor “why cant u send here,” YOUMANS replies, “Cause i dont wanna get banned...” The minor then says “I will when I’m horny,” to which YOUMANS responds, “Ok good.”

The Investigation

10. In or around April 2024, the FBI became involved in a child pornography and sex abuse investigation being conducted by the Town of Wallkill Police Department and the Pennsylvania State Police concerning LONNIE YOUMANS, the defendant.

11. Based on information obtained from law enforcement interviews with a 15-year old minor (“Victim-1”), I have learned the following, in substance and in part:

a. Victim-1 was 15 years old when Victim-1 was introduced to LONNIE YOUMANS, the defendant. A supposedly 14-year-old online friend put Victim-1 in touch with someone who he described as a 20-year-old male named “Lonnie” from New York. “Lonnie” used the Discord display name “Leyley” and username “Zenheatsu.” As noted above, Zenheatsu is a Discord account used by YOUMANS. Over the course of Victim-1’s interactions with YOUMANS, Victim-1 used several different Discord accounts. For simplicity, and to preserve Victim-1’s confidentiality, the Complaint will refer only to “Victim-1.”

b. From at least around late 2023 into early 2024, Victim-1 sent over 60 explicit photos and videos to YOUMANS through Telegram,³ among other means, to YOUMANS' Telegram account, which YOUMANS directed Victim-1 to use. The photos included Victim-1 naked or performing various sexually explicit acts. YOUMANS, in turn, sent Victim-1 explicit images of other minors, and instructed Victim-1 to duplicate their poses. Victim-1 reported that YOUMANS threatened to leak Victim-1's naked images, or blackmail Victim-1's friends, if Victim-1 did not continue to send him images. Victim-1 told YOUMANS that Victim-1 was 16 years old. YOUMANS tried to get Victim-1 to recruit other minors to send YOUMANS sexually explicit materials.

c. YOUMANS introduced Victim-1 to another Discord user, who was allegedly 16 years old and from Maryland ("Discord User-1"). YOUMANS sent Discord User-1 all the explicit photos and videos of Victim-1 that he had. Discord User-1 threatened to leak all of Victim-1's photos if Victim-1 did not send more. Victim-1 sent an additional 20 to 30 explicit photos to Discord User-1 through Telegram. Discord User-1 wanted to meet Victim-1 in person, and Victim-1 provided their real address. Discord User-1 never showed up to the home. Discord User-1 told Victim-1 that if Victim-1 wanted to "get out of this situation," Victim-1 needed to recruit another minor to send sexually explicit materials to Discord User-1. Victim-1 did not oblige, and Discord User-1 leaked Victim-1's explicit photos in a group chat on Telegram.

d. After Victim-1's explicit photos were leaked, a Discord user claiming to be a 19-year-old male living outside the United States ("Discord User-2") and who received Victim-1's photos contacted Victim-1. Discord User-2 told Victim-1, on a Zoom call, to carve his initials into the victim's own thigh or else Victim-1's explicit photos would be leaked again. Victim-1 complied and had approximately 20 Zoom calls with Discord User-2 between in or around December 2023 and January 2024. While on the Zoom calls, Discord User-2 made Victim-1 perform sexual acts.

12. LONNIE YOUMANS, the defendant, knew that Victim-1 was a minor. For example, on or about January 1, 2024, based on my review of Discord conversations between YOUMANS and another Discord user ("Discord User-3"), YOUMANS stated, "We're 4 years apart," and when asked "how old is [Victim-1]," he responded "16." Additionally, Victim-1 told law enforcement that, through Victim-1's discussions with YOUMANS, he knew that Victim-1 was underage. Moreover, as discussed below, YOUMANS confirmed to law enforcement on or about April 29, 2025, that he was aware that Victim-1 was a minor at relevant times.

13. Based on my review of Discord conversations between LONNIE YOUMANS, the defendant, and Victim-1 obtained pursuant to a search warrant, and as set forth below, YOUMANS had an abusive and inappropriate sexual relationship with Victim-1; attempted to induce the creation of sexually explicit materials from Victim-1; confirmed that he had received sexually explicit materials from Victim-1; and promised that he would rape Victim-1, stating "ill get some money so i can come fuck you."

³ Based on my training and experience, Telegram is a multi-platform messaging application that permits users to send messages, create group conversations, call contacts, make video calls, and send files to one another.

a. On or about January 2, 2024, the following Discord conversation occurred between YOUMANS and Victim-1:

Victim-1: I took a shower
Zenheatsu: . . . are you gonna send . . . nudes, show me ur holes
Victim-1: didn't I earlier
Zenheatsu: not enough, and this is for making me lose jj
Victim-1: okay, I will send
Zenheatsu: show me ur holes, and ur doing everything i tell you to.
Victim-1: I will
Zenheatsu: are you sending . . . Did you just cum, And show me ur asshole
Victim-1: no, it's discharge
Zenheatsu: thats hotter so
.
Zenheatsu: w[hat]y[ou]d[oing?]
Victim-1: im getting ready for school
Zenheatsu: . . . Show me, Before you get dressed, Show me ur asshole

b. Based on my review of the Discord conversations between YOUMANS and other Discord users, including Victim-1 and Discord User-3, "jj" was a 13-year-old girl that YOUMANS was attempting to groom. In the above conversation, when YOUMANS said, "this is for making me lose jj," he was attempting to persuade Victim-1 to create and then send him sexually explicit materials to make up for Victim-1's role in causing "jj" to block him. He attempted to persuade Victim-1 at other points in the conversation, stating, "[s]how me ur holes . . . You need to make it up for me for taking jj away from me." YOUMANS reiterated his upset with Victim-1 in a conversation to Discord User-3, stating that "jj" was "[s]omeone whos 13 who I wanted to add . . . but Victim-1 ruined it . . . [s]ame with someone else whos 12."

c. On or about January 27, 2024, the following Discord conversation occurred between YOUMANS and Victim-1:

Zenheatsu: JUST LET ME SIGN IN [TO YOUR ACCOUNT]
I JUST WANNA SEE THE PICS UR SENDING PEOPLE
Victim-1: I don't send pics to people
Zenheatsu: Then let me sign in
Victim-1: I have the right to not consent
Zenheatsu: No
Zenheatsu: You agreed you didnt before
Zenheatsu: So
Victim-1: before
Victim-1: not now

Zenheatsu: You belong to me
Zenheatsu: And only me

d. On or about February 8, 2024, the following Discord conversation occurred between YOUMANS and Victim-1:

Zenheatsu: Do you want us to be sexual again???

Victim-1: yes

Zenheatsu: Then stop threatening me, Stop asking for my personal info, And ill be sexual with you again, Ill even visit you and fuck you

...

Zenheatsu: Are you gonna stop asking for personal info, And threatening me

Victim-1: yeah

Zenheatsu: Thank you, Then ill get some money so i can come fuck you. Ok??

Victim-1: okay

...

Zenheatsu: When ur home from school we can be sexual. Ok??

Victim-1: okay

Zenheatsu: Will that make you happy

Victim-1: yes

14. Based on my review of Discord conversations between LONNIE YOUMANS, the defendant, and other Discord users obtained pursuant to a search warrant, YOUMANS received and distributed images that were child pornography, and which he knew were child pornography. Those images include the following, which Victim-1 confirmed to law enforcement are sexually explicit photos of Victim-1.

a. On or about January 1, 2024, the following Discord conversation occurred in which YOUMANS sent Victim-1 a sexually explicit, close-up image of Victim-1's vagina:

Zenheatsu: [You] sent nudes to someone lol.

Victim-1: you have no proof it was mine

[Zenheatsu sends an image of Victim-1's vagina]

Zenheatsu: :/

Zenheatsu: Looks alot like urs.

Zenheatsu: But alr

Zenheatsu: Whatever [Victim-1]

...

Victim-1: ... I only sent one pic

b. On or about January 1, 2024, YOUMANS sent Discord User-3 a sexually explicit, close-up image of Victim-1's vagina.

c. On or about January 1, 2024, YOUMANS introduced himself to another Discord user ("Discord User-4") as "the one who was dating [Victim-1] who then cheated with you." YOUMANS told the user "I've seen ur dick" and after Discord User-4 asked, "isn't it big," YOUMANS responded "Not really" and "You should shave." Discord User-4 responded, "IM 14." YOUMANS then sent him a sexually explicit, close-up image of Victim-1's vagina.

d. In addition, on or about January 2, 2024, YOUMANS told Discord User-3 that he was sent "jjs tits and the 12yos pussy." As discussed above in paragraph 11(a), "jj" is the 13-year-old minor that blocked YOUMANS, which he blamed on Victim-1. When the Discord user said "WTF" and asked "why," YOUMANS responded: "Bc i asked for them."

e. On January 1, January 2, January 27, and February 8, 2024, the user of the Zenheatsu account accessed Discord from the IP address associated with the Kerhonkson Address, and no other location.

15. Based on my review of Discord conversations between LONNIE YOUMANS, the defendant, and other Discord users obtained pursuant to a search warrant, YOUMANS knew what he was doing was a crime, and that he was trafficking in child pornography. Based on my review of Discord conversations involving YOUMANS obtained pursuant to a search warrant, on or about January 2, 2024—the day after he sent images of Victim-1's vagina to several users on Discord—YOUMANS was told by Discord User-3 that someone's account "got deleted . . . cause the cp spam," to which YOUMANS responded, "what cp spam." Discord User-3 replied, "[Victim-1's] vag . . . got spammed." Based on my training and experience, the term "cp" likely refers to "child pornography." Later that day, YOUMANS told Discord User-3 that Victim-1 "threatened me again . . . threatened me with fbi."

The FBI Search of YOUMANS' Residence

16. On or about April 29, 2025, law enforcement officers executed a search warrant at the Newburgh Address, where LONNIE YOUMANS, the defendant, resides, interviewed YOUMANS and arrested him

17. During my interview of LONNIE YOUMANS, the defendant, he stated the following, in substance and in part: (i) he used the "Zenheatsu" Discord account, including to communicate with Victim-1; (ii) he knew Victim-1 was underage; and (iii) he received sexually explicit images of Victim-1. Agents also confirmed YOUMANS lived at the Kerhonkson Address.

18. Further, LONNIE YOUMANS, the defendant, identified a cell phone as belonging to him. Based on my review of documents received from Discord, the call number for this cell phone is associated with YOUMANS' Discord account. Based on my review of that cell phone pursuant to a search warrant and my conversations with over law enforcement officers concerning the content of that cell phone, the cell phone contained, among other things, a folder of about 270 photographs and videos—most of which constitute child pornography. Those images and videos

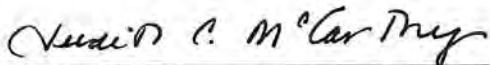
included, but are not limited to, an adult male vaginally penetrating a prepubescent child; a prepubescent female performing oral sex on an adult male; multiple images of adult females performing oral sex on male toddlers; prepubescent children being penetrated by various objects, including hairbrushes and toothbrushes. When asked about this folder and the images they contained, YOUMANS stated that he received those files from other people over Telegram. YOUMANS also confirmed he was aware of the folder on his cell phone and that it contained pornographic images, but he stated he did not know how old the people depicted in the pornography were. At a certain point, YOUMANS stated that he did not believe that the children depicted in certain images and/or videos were toddlers.

WHEREFORE, I respectfully request that LONNIE YOUMANS, the defendant, be imprisoned or bailed, as the case may be.



EMILY ROKITOSKI
Special Agent
Federal Bureau of Investigation

Sworn to before me this
29th day of April, 2025



THE HONORABLE JUDITH C. McCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK