

AUSA Carmi Schickler

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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: *25 my 1448*
UNITED STATES OF AMERICA : COMPLAINT
:
: Violations of 18 U.S.C. § 2251(a)
-v- :
: COUNTY OF OFFENSE:
BRIAN LIAM FULLERTON, : PUTNAM
:
: Defendant. :
:
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SOUTHERN DISTRICT OF NEW YORK, ss.:

KRISTEN SICA, 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
(Sexual Exploitation of a Child)

From at least in or about September 2022 through at least in October 2022, in the Southern District of New York and elsewhere, BRIAN LIAM FULLERTON, 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 and mailed, to wit, FULLERTON, while in Putnam County, New York, directed a 17-year-old ("Victim-1") to take sexually explicit images and videos of Victim-1 and transmit them to him via the internet.

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

COUNT TWO
(Sexual Exploitation of a Child)

From at least in or about April 2023 through at least in June 2023, in the Southern District of New York and elsewhere, BRIAN LIAM FULLERTON, 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 and mailed, to wit, FULLERTON, while in Putnam County, New York, directed a 16-year-old ("Victim-2") to take sexually explicit images and videos of Victim-2 and transmit them to him via the internet.

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

COUNT THREE
(Sexual Exploitation of a Child)

From at least in or about June 2023 through at least in August 2023, in the Southern District of New York and elsewhere, BRIAN LIAM FULLERTON, 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 any 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 and mailed, to wit, FULLERTON, while in Putnam County, New York, directed a 14-year-old ("Victim-3") to take sexually explicit images and videos of Victim-3 and transmit them to him via the internet.

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

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

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the FBI's Field Office in Westchester County, New York. I have been an FBI Special Agent since 2019. I have participated in numerous investigations, including investigations involving crimes against children. I have gained expertise in this area through training and daily work related to conducting and participating in this type of investigation.

2. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and

conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Investigation Background

3. Since at least in or about September 2023, law enforcement has been investigating the sexual exploitation of children by the user of Snapchat account “lomax518.”

4. Based on my review of warrant returns for Snapchat account “lomax518” (the “Material”) and discussions with other law members of law enforcement, I understand that the “lomax518” account has engaged in sexually explicit communications with multiple different Snapchat users who appeared to be females under the age of 18, including several users who sent “lomax518” apparent child sexual abuse material (“CSAM”). I also understand that the holder of the “lomax518” Snapchat account was named “Brian Liam Fullerton,” with a residence address of a house in Mahopac, New York (“FULLERTON’s Address”).

Victim-1 (Count One)

5. Based on my review of the Material, specifically photos and videos exchanged between “lomax518” and Victim-1 via Snapchat, publicly available sources, and my training and experience I am aware that:

- a. On or about September 23, 2022, Victim-1 sent “lomax518” four videos (the “September 23 Videos”) in which a nude female’s genitals were visible and the female appeared to be engaged in masturbation by touching her vaginal area. In one such video, the female’s face is briefly visible. In all four videos, the female has green, painted fingernails and the same rings on her fingers. Based on my review of publicly available sources depicting Victim-1’s face, including Victim-1’s LinkedIn profile, I believe that the female in each of the videos is Victim-1.
- b. On or about September 28, 2022, Victim-1 sent “lomax518” four videos (the “September 28 Videos”) in which a female’s genitals were visible and the female appeared to be engaged in masturbation using the same electric device. In one such video, the female’s face is briefly visible. In each video, the female had peach-colored fingernails. Based on my review of publicly available sources depicting Victim-1’s face, including Victim-1’s LinkedIn profile, I believe that the female in each of the videos is Victim-1.
- c. On or about October 5, 2022, Victim-1 sent “lomax518” three videos in which a nude female’s genitals were visible and the female appeared to be engaged in masturbation by touching her vaginal area while in a shower. In these videos, the female’s face is briefly visible. In each video, the female had peach-colored fingernails. Based on my review of publicly available sources depicting Victim-1’s face, including Victim-1’s LinkedIn profile, I believe that the female in each of the videos is Victim-1.
- d. On or about October 5, 2022, Victim-1 sent “lomax518” a video (collectively with the three foregoing videos sent to “lomax518” on October 5, 2022 the “October 5 Videos”) via Snapchat in which a nude female’s genitals were visible and the female appeared to be

engaged in masturbation by touching her vaginal area. In this video, the female had peach-colored fingernails. Based on my review of this video, including the female's fingernails, I believe that the female in this video is Victim-1.

6. On or about April 18, 2025, myself and another FBI Special Agent interviewed Victim-1 via telephone. During that interview, Victim-1 stated that when Victim-1 was approximately fifteen years old, she met an individual on a digital messaging application, whom she knew as "Brad," who lived in New York. Victim-1 later exchanged messages with "Brad" on both Instagram and Snapchat, and "Brad" requested that Victim-1 send nude pictures and videos of herself to "Brad." Victim-1, while under eighteen years old, subsequently sent "Brad" nude pictures and videos of herself. Additionally, "Brad" sent Victim-1 pictures purporting to be of his genitalia. "Brad" also told Victim-1 that he was a cardio pulmonary doctor, while sending Victim-1 pictures of himself in medical scrubs.

7. On or about April 21, 2025, Victim-1 provided me with screenshots of Snapchat messages Victim-1 had exchanged with "Brad," who was using Snapchat account "lomax518," in or about December 2021, including the following picture (the "December 2021 Picture") that "lomax518" sent to Victim-1:



Victim-2 (Count Two)

8. Based on my review of the Material, specifically photos and videos exchanged between "lomax518" and Victim-2 on Snapchat, and my training and experience, I am aware that:

- a. On or about June 5, 2023, at approximately 21:26:41 UTC, Victim-2 sent "lomax518" a video depicting an adolescent female, later identified as Victim-2, nude from her breasts down, in the shower. Victim-2's genitals are visible in the video.
- b. On or about June 8, 2023, at approximately 2:11:53 UTC, Victim-2 sent "lomax518" one image and one video (the "June 8 CSAM"). The image is a female, later identified as Victim-2, with her genitals visible. The video depicts a female, later

identified as Victim-2, with her finger touching her vaginal area. Based on my training and experience, I believe that this video depicts Victim-2 masturbating.

c. On or about June 12, 2023, at approximately 2:36:20 UTC, Victim-2 sent “lomax518” a video (the “June 12 Video”) that depicts a nude female, later identified as Victim-2, engaged in a sexual act with a pillow, with Victim-2’s genitals briefly visible.

d. On or about June 29, 2023, at approximately 1:15:43 UTC, Victim-2 sent “lomax518” an image and a video (the “June 29 CSAM”). The image is a picture of a female, later identified as Victim-2, nude from her breasts down, with her genitals exposed. The video depicts a female, later identified as Victim-2, nude from her breasts down, with her finger touching her vaginal area. Based on my training and experience, I believe that this video depicts Victim-2 masturbating.

9. Based on my involvement in this investigation, personal observations, conversations with other members of law enforcement, and review of law enforcement reports and records, I understand that on or about April 29, 2024, an FBI forensic interviewer interviewed Victim-2. During that interview, Victim-2 stated that approximately a year prior, and for approximately one month, Victim-2 had conversations via Snapchat with an older man named “Brad” whom she understood was located in New York and whom she described as a 40-something white male with dark gray hair, glasses, and a beard with gray hair. Victim-2 stated that she believed “Brad” worked in the medical field, and that he had sent Victim-2 video messages in which he was wearing medical scrubs. Victim-2 also stated that “Brad” knew that, at the time of his conversations with Victim-2, Victim-2 was 15 years old, as “Brad” and Victim-2 had discussed their age difference. Victim-2 estimated that she had sent 10 pictures and one or two videos of herself to “Brad,” and she subsequently identified herself as the individual depicted in several images and videos containing CSAM she had sent to “Brad.” Victim-2 also stated that “Brad” had requested that she produce and send him the June 12 Video.

Victim-3 (Count Three)

10. Based on my review of the Material, specifically photos and videos exchanged between “lomax518” and Victim-3 on Snapchat, and my training and experience, I am aware that:

- a. On or about June 11, 2023, at approximately 6:23:53 UTC, “lomax518” sent an image to Victim-3 of male genitalia.
- b. On or about June 11, 2023, at approximately 18:34:58 UTC, “lomax518” sent a text message to Victim-3 asking Victim-3 to “Rub your princess parts for daddy.” On or about June 12, 2023, at approximately 2:48:30 UTC, Victim-3 sent “lomax518” an image depicting a female with her breasts exposed and her finger inside her underwear, near her vaginal area.
- c. On or about June 30, 2023, at approximately 20:34:51 UTC, Victim-3 sent “lomax518” a video depicting a female, nude from the waist upwards, rubbing her breasts. On or about June 30, 2023, at approximately 20:36:16 UTC, “lomax518” sent a

text message to Victim-3 asking Victim-3 to “Send another one like that but this time rubbing your little pussy through those shorts.” On or about June 30, 2023, at approximately 20:44:38 UTC, Victim-3 sent “lomax518” a video depicting a female, from the waist downwards, with her hands moving inside her underwear near her vaginal area. Based on my training and experience, I believe that this video depicts a female masturbating.

d. On or about July 5, 2023, at approximately 16:41:39 UTC, Victim-3 sent “lomax518” a video (the “July 5 Video”) depicting a female, from the waist downwards, with her hands moving inside her underwear near her vaginal area. Based on my training and experience, I believe that this video depicts a female masturbating.

e. Between on or about July 14, 2023 and on or about July 17, 2023, “lomax518” sent dozens of sexually explicitly text messages to Victim-3 via Snapchat. Included in these text messages was the following text message: “I wish you lived in New York, so I can fuck you for real.”

f. Between on or about July 18, 2023 and August 1, 2023, “lomax518” sent dozens of sexually explicitly text messages to Victim-3 via Snapchat. Included in these text messages were the following text messages: “You want to be bred by a man three times your age you dirty little girl”; “Good, I scrolled to make sure my face wasn’t in any pics don’t need them seeing how old I am ;)”; “Not everyone finds our age gap as hot as we do princess.”

11. Based on my involvement in this investigation, personal observations, conversations with other members of law enforcement, and review of law enforcement reports and records, I understand that on or about June 28, 2024, an FBI forensic interviewer interviewed Victim-3. During that interview, Victim-3 stated that “lomax518” had told her that his name was “Brad,” he was approximately forty years old, and he lived in New York. Victim-3 also stated that she had sent “Brad” images and videos of herself and that, at that time, she was fourteen years old but had told “Brad” that she was fifteen years old. Victim-3 further stated that “Brad” had grey or blond hair, was white and pale, and had a poorly shaven beard.

Identification and Location of FULLERTON

12. Based on my review of returns from subpoenas issued to Snap, Inc., I understand that, as of in or about December 2023, the Snapchat username “lomax518” was associated with the email address “brianliamfullerton@gmail.com” and a specific phone number ending in 3669 (the “3669 Phone Number”).

13. Based on my review of returns from subpoenas issued to Verizon Wireless, I understand that, as of on or about April 4, 2024, the 3669 Phone Number was associated with “Brian Fullerton,” with a listed address of FULLERTON’s Address.

14. Based on my review of open-source property records, I am aware that, as of June 14, 2024, “Brian L. Fullerton” was an owner of FULLERTON’s Address. I am also aware that

on or about December 16, 2011, a deed was recorded stating that “Brian L. Fullerton” and another individual purchased FULLERTON’s Address.

15. Based on my review of the Material, including IP data from Snapchat, I understand that:

- a. On or about September 30, 2022, in response to an inquiry from Victim-1, “lomax518” stated in a text message (the “September 30 Message”) that he was, in sum and substance, at “home” watching football after dinner. When “lomax518” sent the September 30 Message, he was using a specific IP address ending in 139 (the “139 IP Address”) to access Snapchat.
- b. When “lomax518” accessed the September 23 Videos, the September 28 Videos, and the October 5 Videos, each of which contained CSAM, he did so using the 139 IP Address.
- c. Based on the foregoing, I submit there is probable cause to believe that “lomax518” was at the same address, *i.e.*, in his home, when sending the September 30 Message and when accessing the September 23 Videos, the September 28 Videos, and the October 5 Videos. I further submit that there is probable cause to believe that such address was FULLERTON’s Address.

16. Based on my review of the Material, including IP data from Snapchat, and subpoena returns from Verizon:

- a. On or about June 8, 2023, at approximately 1:58:09 UTC, “lomax518” logged into Snapchat using a specific IP address ending in 140 (the “140 IP Address”). Approximately 13 minutes later, Victim-2 sent “lomax518” the June 8 CSAM. On or about June 8, 2023, the 140 IP Address was assigned to “Brian Fullerton” and associated with an address of FULLERTON’s Address, the 3669 Phone Number, and the email address “brianliamfullerton@gmail.com.”
- b. On or about June 12, 2023, at approximately 2:32:46 UTC, “lomax518” logged into Snapchat using the 140 IP Address. Approximately four minutes later, Victim-2 sent “lomax518” the June 12 Video. Approximately eight minutes later, “lomax518” logged out of Snapchat using the 140 IP Address. On or about June 12, 2023, the 140 IP Address was assigned to “Brian Fullerton” and associated with an address of FULLERTON’s Address, the 3669 Phone Number, and the email address “brianliamfullerton@gmail.com.”
- c. On or about June 29, 2023, at approximately 1:01:26 UTC, “lomax518” logged into Snapchat using a specific IP address ending in 142.17 (the “142.17 IP Address”). Approximately 14 minutes later, Victim-2 sent “lomax518” the June 29 CSAM. Approximately 84 minutes later, “lomax518” logged out of Snapchat using the 142.17 IP Address. On or about June 29, 2023, the 142.17 IP Address was assigned to “Brian Fullerton,” with an address of FULLERTON’s Address, the 3669 Phone Number, and the email address “brianliamfullerton@gmail.com.”

17. Based on my review of a CyberTipline Report (the “NCMEC Report”) sent to the National Center for Missing & Exploited Children (“NCMEC”), I know that, on or about September 20, 2023, Snapchat reported four files of suspected child pornography to NCMEC. In the NCMEC Report, Snapchat identified the “suspect” as associated with the username “lomax518,” the 3669 Phone Number, the email address “brianliamfullerton@gmail.com,” and a specific IP address ending in 182 (the “182 IP Address”). One of the files reported by Snapchat was a video sent on or about July 5, 2023, at approximately 16:41:39 UTC, *i.e.*, the same date and time at which Victim-3 sent “lomax518” the July 5 Video containing CSAM. The NCMEC Report also states that the “suspect” had been using the 182 IP Address to access Snapchat, which IP address was registered to Verizon in Yorktown Heights, in Westchester County, New York.

18. Based on my review of records from the New York State Department of Motor Vehicles (“DMV”), I understand that the individual depicted in the following picture from in or about September 2019 (the “September 2019 DMV Picture”) is BRIAN LIAM FULLERTON, the defendant:



19. Based on my involvement in this investigation, personal observations, conversations with other members of law enforcement, review of the Materials, and review of law enforcement reports and records, I understand that:

- a. On or about August 1, 2023, “lomax518” sent Victim-3 a message on Snapchat that stated “Did I tell you Im going away to Ireland tomorrow?”
- b. On or about August 2, 2023, BRIAN LIAM FULLERTON, the defendant, departed Newark International Airport via United Airlines flight 976 and travelled to Shannon International Airport in Ireland.
- c. On or about August 14, 2023, FULLERTON departed Shannon International Airport via United Airlines flight 977 and travelled to Newark International Airport in New Jersey.
- d. I believe that the photo in the passport FULLERTON used while traveling to and from Ireland displays the same person as in the September 2019 DMV Picture and in the December 2021 Picture that “lomax518” sent to Victim-1, all of which display BRIAN LIAM FULLERTON, the defendant.

WHEREFORE, the deponent respectfully requests that BRIAN LIAM FULLERTON, the defendant, be arrested and imprisoned or bailed, as the case may be.


KRISTEN SICA
Special Agent
Federal Bureau of Investigation

Sworn to me this 15th day of May, 2025


THE HONORABLE JUDITH C. McCARTHY
United States Magistrate Judge
Southern District of New York