

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JAMES HARRISON NEWCOMER aka
JAKE HARRISON NEWCOMER,
Defendant.

NO. MJ24-363

COMPLAINT for VIOLATION

Title 18, United States Code,
Sections 2423(b)

BEFORE the Honorable Brian A. Tsuchida, United States Magistrate Judge,
United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Travel with Intent to Engage in a Sexual Act with a Minor)

On or about April 10, 2024, and April 12, 2024, in King County, within the Western
District of Washington, and elsewhere, the defendant, JAMES HARRISON NEWCOMER
aka JAKE HARRISON NEWCOMER, did knowingly travel in interstate commerce, to wit
from King County, Washington to Woodburn, Oregon, for the purpose of engaging in illicit
sexual conduct, that is, the sexual acts of contact between the penis and the vulva, penis to

1 the anus, contact between the mouth and the penis, and contact between the mouth and the
2 vulva.

3 All in violation of Title 18, United States Code, Section 2423(b) and 2246(2)A) and
4 (B).

5 And the Complainant states that this Complaint is based on the following information:
6 I, Andrew Butler, being first duly sworn on oath, depose and say:

7 **I. INTRODUCTION**

8 1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and
9 have been since October 2019. Prior to this assignment I was an Infantry Officer in the
10 United States Army. I am currently assigned to the Seattle Field Office in Seattle,
11 Washington and serve on the FBI Seattle Child Exploitation and Human Trafficking Task
12 Force and as a member of the Washington State Internet Crimes Against Children (ICAC)
13 Task Force. As an FBI Special Agent, I investigate criminal violations relating to child
14 exploitation and human trafficking, including violations pertaining to the commercial sexual
15 abuse of minors and adults, and the online sexual exploitation of children involving the
16 transmission, possession and production of child pornography, exploitation of children on
17 the internet, as well as other federal criminal activity and attempts or conspiracies to commit
18 those crimes. I have received specialized training from the FBI Academy consisting of legal
19 classes, criminal procedure, investigative techniques, evidence preservation and collection,
20 and other law enforcement training classes. Through my training and experience, I have
21 developed an understanding of common habits and practices used by those engaged in
22 criminal acts against children and those who facilitate the commercial sex trafficking of
23 minors and adults.

24 2. I am familiar with and have participated in a variety of investigative techniques
25 including but not limited to surveillance, interviewing of witnesses/suspects, and the
26 execution of search and seizure warrants, and arrest warrants that involved child exploitation,
27 child pornography offenses, and/ or commercial sex trafficking offenses.

1 3. As further detailed below, based on my investigation and the investigation of
2 other law enforcement officers, I believe there is probable cause to conclude that JAKE
3 HARRISON NEWCOMER has committed the offense charged in this complaint namely,
4 Travel with the Intent to Engage in a Sexual Act with a Minor in violation of 18 U.S.C. §
5 2423(b).

6 4. The information contained in this affidavit consists of my personal knowledge
7 gained through this investigation, information provided by other law enforcement agencies
8 involved in this investigation, information provided by witnesses and others with knowledge
9 of the relevant events and circumstances, information gleaned from my review of evidence,
10 and my training and experience. Because this affidavit is offered for the limited purpose of
11 establishing probable cause, I list only those facts that I believe are necessary to support such
12 a finding. I do not purport to list every fact known to me or others as a result of this
13 investigation.

14 II. SUMMARY OF INVESTIGATION

15 2020 Rape of a Child Third Degree – Two Counts – King County Superior Court

16 5. JAMES HARRISON NEWCOMER aka JAKE HARRISON NEWCOMER
17 birth year 1996 was convicted of two counts of Rape of a Child in the Third Degree
18 following his sexual assault of a 15 year old female victim between July 24, 2020, and July
19 27, 2020. That investigation revealed that NEWCOMER, then 24 years old, reported to the
20 victim that he was 17 years old when he added the victim on Snapchat, a social medial
21 platform. After interacting with the victim for less than 24 hours, NEWCOMER drove from
22 King County, Washington to Clallam County, Washington and picked the victim up near a
23 bed and breakfast where she was visiting with her family. NEWCOMER drove for
24 approximately five minutes, pulled over the vehicle at an unknown area, and sexually
25 assaulted the victim orally and vaginally.

26 6. NEWCOMER provided the victim with alcohol and marijuana and drove the
27 victim to his parent's King County residence where he resided. He snuck the victim into his
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1 parent's home and sexually assaulted her approximately ten times over several days before
2 she was recovered at his parent's residence by law enforcement on July 27, 2020.

3 7. After serving 30 months in prison, NEWCOMER was under conditions of
4 Community Custody with the Department of Corrections (hereafter DOC) and was required
5 to register as a sex offender. Pursuant to the terms of NEWCOMER's community custody he
6 was required to wear an ankle monitor. On January 19, 2024, NEWCOMER's ankle monitor
7 died and lost connection. On January 25, 2024, Washington DOC attempted to arrest
8 NEWCOMER at his residence, but were unable to locate him. Washington DOC entered an
9 arrest warrant for NEWCOMER following the ankle monitor battery dying and
10 NEWCOMER's unknown location. On June 7, 2024, NEWCOMER was arrested in Kent,
11 Washington and is currently in custody for his DOC violations.

12 **MINOR VICTIM 1: Snoqualmie Police Department – February 2024**

13 8. On or about February 8, 2024, I was contacted by Snoqualmie Police
14 Department Officer Aguirre about a missing 16 year old female MINOR VICTIM DOB
15 2007 (hereinafter MV1). Within several hours of the notification, MV1 returned home. A
16 subsequent Snoqualmie Police Department investigation discovered that MV1 was picked up
17 at her North Bend residence and provided narcotics by an adult male identified by Snapchat
18 username "Halyc0n." Specifically, investigators learned that MV1 was added on Snapchat
19 by halyc0n, who picked up MV1 from her North Bend, Washington residence at
20 approximately 1:00 a.m. on February 7, 2024, and was driven to an apartment in the Seattle,
21 Washington where halyc0n provided MV1 methamphetamine. A toxicology screening was
22 subsequently administered to MV1 and yielded positive result for methamphetamine.
23 Halyc0n drove MV1 back home on February 8, 2024, at approximately 8:00am.

24 9. A neighbor observed a black Toyota sedan drop MV1 off in the vicinity of her
25 residence and attempted to follow the vehicle. The neighbor observed the black Toyota sedan
26 did not have license plates. MV1's mother, (hereafter MOTHER1), reported that she viewed
27 photos, videos, and messages between MV1 and halyc0n which confirmed sexual intercourse
28 occurred.

1 10. On February 9, 2024, MV1 was forensically interviewed. MV1 disclosed that
2 she was added on Snapchat by halyc0n and met in person with him the same day. MV1
3 described halyc0n as a 28-year-old male and her relationship with him as romantic. MV1
4 confirmed she was picked up by halyc0n, whom she called “J” on February 7, 2024, at
5 approximately 0100 PST and was taken to his Seattle apartment where she met his adult
6 roommate and roommate’s adult girlfriend. “J” instructed MV1 to claim she was 18 years
7 old so she did not become suspicious to the roommates’ adult girlfriend. As detailed below,
8 investigators subsequently confirmed the identity of Snapchat user halyc0n as
9 NEWCOMER.

10 **MINOR VICTIM 2: Auburn Police Department – February 2024**

11 11. During the course of the Snoqualmie Police Department investigation, I
12 learned of a similar Auburn Police Department case involving Snapchat username “halyc0n.”
13 On February 22, 2024, Auburn Police Department was notified that MINOR VICTIM 2
14 DOB 2008 (hereafter MV2 2008) ran away overnight. MV3’s mother (hereafter MOTHER2)
15 reporting having viewed MV2’s laptop and observing Snapchat messages between MV2 and
16 Snapchat username halyc0n. Halyc0n’s messages to MV2 detailed how MV2 could disable
17 the security alarm on her window and instructed MV2 to wait until her parents go to sleep
18 before leaving. Halyc0n reported he would be waiting to pick MV2 up and expressed plans
19 to get MV2 a fake identification card that reported MV2 to be 18 years old instead of 15
20 years old. The Snapchat messages detailed the intention behind the fake identification card
21 would be to allow MV2 to gain access to online pornographic websites where videos of
22 sexual contact between MV2 and halyc0n could be uploaded to make money.

23 12. Described below in relevant part, are two Snapchat communications send from
24 halyc0n to MV2:

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1 a. "You know. Just for the record. I would be more inclined. to take you
2 away forever. If I knew there would be money coming in. Now obviously I would never
3 pimp you out sweetpea. you belong to me. and only me. but. There ARE things. That dont
4 involve you being in any. situation with other real people. That could male some living
5 money pretty easily. but they are only things I could set up to do with you. If I had you
6 around all the time. Like we could get on cam together."

7 b. "Get you a fake ides. ID. And we could go be "legal loli porn. on a cam
8 site. we would rake it in savagely. Because of your size. and because the company would
9 think you were 18. Because of the fake ID. So if you want to get out sooner. Perhaps you
10 should think on that. But it cant really be like. Okay Ill do it.and then I take you. And you
11 puss out at the last second. Cause if that money doesnt come through from somewhere to pay
12 for you to have what you need. You and I are BOTH fuckdc. fucked. So if you decide you
13 wouldn't mind fucking on camera with me. Perhaps you could leave sooner than I thought.
14 Just a thoughtr. thought.* Cammers make a lot of money. plus by camming. you open up the
15 ability to sell. if you wish. which is a business that runs itself. lol. Your tiny body is actually
16 worth a lot of money. without even having to touch anyone. Or actually see them. Something
17 to consider."

18 13. MV2 disclosed to investigators that she received a Snapchat message from a
19 user identified as "Aiden" in June 2023. In September 2023, MV2 sent "Aiden" two fully
20 nude photographs of herself via Snapchat and to visiting "Aiden's" two-bedroom apartment
21 in Seattle, where he lived with a roommate. MV3 stayed in one room at the apartment and
22 the roommate in another. MV2 reported communicating with "Aiden." I reviewed the data
23 returned by Snapchat for halyc0n's account, obtained by a search warrant executed by
24 Snoqualmie Police Department relating to the investigation involving MV1. I observed
25 Snapchat user halyc0n was in fact in communication with MV2 on February 4, 2024. It is
26 unclear if MV2 was protecting halyc0n or failed to accurately recall his username when
27 speaking with law enforcement.

28 **MINOR VICTIM 3: Woodburn Police Department – April 2024**

14. On or about May 15, 2024, I contacted FBI Special Agent Chelsea Barker
about subject Snapchat user "halyc0n". I learned from Special Agent Barker that a sexual
assault involving a subject Snapchat user "halyc0n" occurred in Woodburn, Oregon.
Woodburn Police Department investigated a report that a 14 year old MINOR VICTIM DOB
2009 (hereafter MV3), had been sexually assaulted by an adult man in the Salem, Oregon

1 area. Woodburn Police detectives obtained a search warrant for MV3's Snapchat records and
2 observed that MV3 interacted with Snapchat user "halyc0n." Described below in relevant
3 part, are Snapchat communications sent from halyc0n to MV3:

4 April 6, 2024, 3:49am "halyc0n" to MV3 via Voice Note: "...We're hanging out.
5 We're fucking. I promise..."

6 April 9, 2024, 3:18am "halyc0n" to MV3 via Voice Note: "I can come right now. It'
7 going to be about 2 hours and 15 minutes."

8 April 10, 2024, 12:09am "halyc0n" to MV3 via Snapchat text: Jpeg image of
9 screenshot of phone navigation. Depicts vehicle headed south on WA-507 S near 92
10 AV S and 342nd Street S with an ETA of 3:20am.

11 April 10, 2024, 3:43am MV3 to "halyc0n" via Snapchat text: "Are u here"

12 April 10, 2024, 3:46am "halyc0n" to MV3 via Voice Notes: I'm in a Black Toyota
13 Camry and I'm about to be at the address.

14 15. Woodburn Police Department reviewed Snapchat messages between MV3 and
15 halyc0n on April 12, 2024. In those messages Woodburn Police Department investigators
16 observed messages by halyc0n, which described having sex with MV3 in his vehicle.
17 Halyc0n stated he bought privacy screens and mentioned they would have sex in an area near
18 Walmart. Halyc0n detailed sexual acts he planned to perform on MV3, which included
19 vaginal, oral and anal sexual penetration. MV3 shared plans of running away from home
20 with halyc0n, who in turn expressed his willingness to assist her.

21 16. During a subsequent interview with law enforcement, MV3 disclosed that on
22 April 10, 2024, a male from Washington identified as "Jack" picked her up. MV3 recalled
23 the male listed his age as 16 years old on his Yubo social media. MV3 described being
24 sexually assaulted in a Walmart parking lot by "Jack" to include vaginal and anal
25 penetration. "Jack's" vehicle did not have license plates because the police were after him.

26 17. MV3 disclosed that "Jack" picked her up again on April 12, 2024, after she
27 snuck out of the house. "Jack" drove to a Super 8 Hotel in Woodburn, Oregon where he
28 sexually assaulted MV3 to include vaginal and oral penetration.

1 18. On May 15, 2024, Snoqualmie Police Department Officer Aguirre sent a
2 request for information via email to law enforcement officers and prosecutors in the greater
3 Seattle, Washington area. Included in the request for information were subject identifiers for
4 Snapchat user halyc0n and photographs of Snapchat user halyc0n. Photographs of subject
5 halyc0n were provided to law enforcement by MV1's parents of halyc0n. Photographs
6 included in the request for information email were identified to be NEWCOMER by
7 Washington DOC Community Corrections Officer Bullard, who supervised NEWCOMER
8 following his sex offense convictions. Through interagency coordination between
9 Snoqualmie Police Department, Woodburn Police Department, Washington DOC, and the
10 FBI, Woodburn Police Department identified the male that picked up MV3 on April 10,
11 2024, and April 12, 2024, was NEWCOMER.

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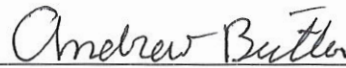
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III. CONCLUSION

19. The affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

20. Based on the above facts, I respectfully submit that there is probable cause to believe that JAMES HARRISON NEWCOMER aka JAKE HARRISON NEWCOMER did Travel with Intent to Engage in Sexual Acts with a Minor, in violation of Title 18, United States Code, Section 2423(b).



ANDREW BUTLER, Complainant
Special Agent
Federal Bureau of Investigation

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on this 17th day of June, 2024.



BRIAN A. TSUCHIDA
United States Magistrate Judge