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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

MICHAEL GRENNIER

:  
: Hon. Tonianne J. Bongiovanni  
:  
: Mag. No. 13-5031  
:  
: **CRIMINAL COMPLAINT**

I, Joshua Wilson, 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 Federal Bureau of Investigation, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

\_\_\_\_\_  
Joshua Wilson, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

February 19, 2013 at \_\_\_\_\_  
Date

Trenton, New Jersey  
City and State

Honorable Tonianne J. Bongiovanni  
United States Magistrate Judge  
Name and Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Sexual Exploitation of Children**

On or about February 14, 2013, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

MICHAEL GRENNIER

did knowingly employ, use, persuade, induce, entice, and coerce "JANE DOE," a minor female, to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, and the visual depiction was transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

## ATTACHMENT B

I, Joshua Wilson, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have knowledge of the facts set forth below as a result of my participation in this investigation as well as from my review of reports from, and discussions with, other law enforcement personnel. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, 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.

1. On or about February 15, 2013, the FBI executed a consent search at the Middlesex County, New Jersey home of “JANE DOE,” a minor female. In an interview with FBI personnel on that date, JANE DOE stated the following:

a. For several years MICHAEL GRENNIER has paid JANE DOE for photographs and videos of JANE DOE naked and partially clothed. On some occasions, GRENNIER photographed and videotaped JANE DOE. On other occasions, JANE DOE photographed herself and sent those photographs to GRENNIER via the internet. GRENNIER has also paid JANE DOE to perform sexually explicit acts, which GRENNIER videotaped. GRENNIER has also paid JANE DOE to perform sexual acts with him.

b. In or about 2012, GRENNIER paid JANE DOE \$350 to masturbate GRENNIER while JANE DOE was naked. JANE DOE believes that GRENNIER photographed JANE DOE while she was performing this act.

c. In or about 2012, GRENNIER paid JANE DOE and “MARY ROE,” a minor female, to perform sexual acts with each other and with GRENNIER at a hotel in New Jersey. GRENNIER set up cameras in the hotel room and videotaped the encounter. GRENNIER paid JANE DOE and MARY ROE \$500 each in exchange for performing these acts.

d. On another occasion, in or about 2012, GRENNIER paid JANE DOE and MARY ROE to perform sexual acts with each other and with GRENNIER at a hotel in New Jersey. GRENNIER set up cameras in the hotel room and videotaped the encounter. GRENNIER provided things of value to JANE DOE and MARY ROE in exchange for performing these acts.

e. In addition to providing pictures to GRENNIER, GRENNIER paid JANE DOE to masturbate in front of her computer while GRENNIER watched via webcam from another computer. GRENNIER recorded these sessions. The last time JANE DOE and GRENNIER did this was at approximately 10:30 p.m. on February 14, 2013. GRENNIER was

going to pay JANE DOE for performing this act by purchasing approximately \$175 worth of merchandise from a particular clothing store (the “Clothing Store”).

2. On or about February 15, 2013, the FBI executed a consent search of a computer in JANE DOE’s home. That search revealed several photographs of what appears to be a naked minor female in various poses, including close-up photographs of her vaginal area. Some of the photographs were taken from the neck down.

3. On or about February 15, 2013, the FBI executed a consent search of JANE DOE’s cellular telephone. That search revealed the following series of text messages between JANE DOE’s cellular telephone and the cellular telephone belonging to MICHAEL GRENNIER between approximately 10:15 p.m. and approximately 10:53 p.m. on or about February 14, 2013:

[GRENNIER’S PHONE]: i cant see its blocking

[GRENNIER’S PHONE]: i cant see

[GRENNIER’S PHONE]: the camera is blocked

[GRENNIER’S PHONE]: no good at all – cant see

[GRENNIER’S PHONE]: No good at all

[GRENNIER’S PHONE]: no good at all

[GRENNIER’S PHONE]: can I restart

[GRENNIER’S PHONE]: and your not watching ----- if you cant see me waving you off

[JANE DOE’S PHONE]: I didnt realize my brightness was down i can see but it was blurry do i have to put my clothes on again

[GRENNIER’S PHONE]: no there was s cloth or something blocking the bottom of the camera

[GRENNIER’S PHONE]: no

[GRENNIER’S PHONE]: just watch and masterbate like you were

4. Subsequent to those text messages, the following series of text messages between JANE DOE's cellular telephone and the cellular telephone belonging to MICHAEL GRENNIER were found on JANE DOE's cellular telephone:

[GRENNIER'S PHONE]: ok - where do i order

[JANE DOE'S PHONE] [Clothing Store] and just use my address for billing and shippin just use your credit card I guess