
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

LUCAS J. REINMANN

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Hon. Joseph A. Dickson, U.S.M.J.

Mag. No. 13-6743

CRIMINAL COMPLAINT

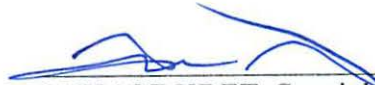
I, LUKASZ KRET, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



LUKASZ KRET, Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,
October 28, 2013, at Newark, New Jersey



HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

On or about June 8, 2013, in Morris County, in the District of New Jersey, and elsewhere,
defendant

LUCAS J. REINMANN

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer.

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

ATTACHMENT B

I, LUKASZ KRET, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. 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.

Background

1. At all times relevant to this Complaint, defendant LUCAS J. REINMANN (“REINMANN”) was a resident of Boonton, New Jersey.

The Investigation

2. On or about June 8, 2013, an HSI Special Agent working in an undercover capacity utilized a software program for law-enforcement and an undercover computer to access a publicly available peer-to-peer (“P2P”) network over the Internet and observed an individual using the name “Lucas” (the “P2P ID”) and a certain Internet Protocol (“IP”) address that was logged into the network. The investigation revealed that the IP address was assigned to a single-family home in Boonton, New Jersey (the “Boonton Residence”).

3. During the June 8, 2013 session, the law enforcement software program uncovered that the software running on the P2P ID’s computer supported browse host and file preview, but it also allowed the user to disable the browse host function. Thus, at the time of the direct connection, that computer actively allowed other users on the P2P network to browse the contents of P2P ID’s shared folder despite the P2P network permitting the P2P ID to turn off the ability of other users to browse and download the contents of that shared folder. The law enforcement software program identified more than 1650 files suspected of being child pornography being shared from the P2P ID’s computer.

4. The law enforcement software program analyzed the shared folder and identified titles of files suspected to contain images of child pornography. Between 4:14 p.m. and 4:47 p.m. on June 8, 2013, the law enforcement software program downloaded from the P2P ID’s folder approximately 10 image files suspected of depicting child pornography. The HSI Special Agent working in an undercover capacity visually checked the ten downloaded files and confirmed them to be child pornography. Three of the files downloaded by the law enforcement software program from the user had filenames and descriptions as follows:

IMAGE	FILENAME (SHA1 VALUE)	DESCRIPTION
1	lsw-003-051.jpg	This image depicts a nude female between 10 and 14 years old laying on a red chair. A green background can be seen behind her. The picture is a close up of her laying on her side and only shows her from waist to ankle. Her left leg is up and the right leg is down exposing her vagina. Next to her vagina is a small white pillow. In the upper left hand corner is an advertising banner which reads, "LS MODELS."
2	lsw-014-051.jpg	This image depicts a nude female between 10 and 14 years old sitting on a yellow shag carpet. The picture is from her stomach to her knees. She has her legs spread with her vagina exposed. It appears she may have a white shag carpet draped over her upper body or is wearing some white fur item. In the upper right hand corner is an advertising banner which reads, "LS MODELS."
3	lsw-013-041.jpg	This image depicts a nude female between 10 and 14 years old on her hands and knees. The picture is her back, buttocks, vagina, and legs up to the knees. She has her legs spread with her vagina and anus exposed. It appears she may be on a green and floral floor. Behind her is a blue background and a floral arrangement to her left side. In the upper right hand corner is an advertising banner which reads, "LS MODELS."

5. The HSI Special Agent working in an undercover capacity also visually checked the file names of the 1650 files suspected of being child pornography and confirmed that the file names matched file names of known child pornography.

6. The investigation revealed that the IP Address that was used to share these images of child pornography was assigned to a Verizon Fios account at the Boonton Residence.

7. On July 15, 2013, law enforcement officers executed a search warrant at the Boonton Residence and discovered computer equipment belonging to defendant REINMANN, including one laptop Hewlett Packard 2000 notebook computer, one Compaq Presario notebook computer, one MacBook Air laptop computer, and nine thumb drives. Among the files law enforcement found on the computer equipment belonging to defendant REINMANN were multiple images of child pornography, as defined by Title 18, United States Code, Section 2256(8), including images involving prepubescent minors.

8. Further analysis of the Hewlett Packard 2000 notebook computer seized from defendant REINMANN revealed that it contained the P2P software and was logged in to the P2P network using the P2P ID at the time the files were shared, as described in paragraph five, above.

9. Defendant REINMANN admitted to law enforcement officers, among other things, in substance and in part, that: (1) he uses the internet to download child pornography; (2) he had over 1000 files of child pornography on his flash drives (thumb drives); and (3) that he believed that the child pornography he has seen depicts real children.

10. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images described in paragraph 3 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet via the P2P network.