
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Rukhsanah L. Singh
v. : Mag. No. 2024-mj-14010
JEREMY GREENWALD : **CRIMINAL COMPLAINT**

[TO BE FILED UNDER SEAL]

I, Charles Paddock, 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 of 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.

s/ Charles Paddock

Charles Paddock, Special Agent
Federal Bureau of Investigation

Attested to by telephone pursuant to
F.R.C.P. 4.1(b)(2)(A) on this 13th day of
February 2024, in the District of New
Jersey.

Honorable Rukhsanah L. Singh
United States Magistrate Judge
Name & Title of Judicial Officer

R. Singh
Signature of Judicial Officer

RECEIVED

FEB 13 2024

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

ATTACHMENT A

COUNT ONE
(Sexual Exploitation of Children)

From on or about May 18, 2022, through on or about May 27, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JEREMY GREENWALD,

did knowingly employ, use, persuade, induce, entice, and coerce MINOR VICTIM 1, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and which depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and did attempt so to do.

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

COUNT TWO

(Online Enticement of a Minor to Engage in Criminal Sexual Conduct)

From on or about May 18, 2022, through on or about May 27, 2022, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

JEREMY GREENWALD,

using the mail and any facility and means of interstate and foreign commerce, did knowingly persuade, induce, entice, and coerce MINOR VICTIM 1, an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense, and did attempt so to do.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE
(Receipt of Child Pornography)

From on or about May 18, 2022, through on or about May 27, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JEREMY GREENWALD,

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting 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).

ATTACHMENT B

I, Charles Paddock, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit 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 and time, I am asserting that it took place on or about the date and time alleged.

1. In or around February 2023, law enforcement agents from the FBI learned that a sixteen-year-old female ("MINOR VICTIM 1"), living in a state outside of New Jersey, had been communicating via a voice, video, and text chat application platform (the "Platform") with two specific Platform accounts ("Greenwald's Platform Account 1" and "Greenwald's Platform Account 2"), each of which purported to be controlled by an approximately forty-year-old adult male, subsequently identified by law enforcement as GREENWALD.

2. MINOR VICTIM 1 first communicated with GREENWALD beginning in or around May 2022 via Greenwald's Platform Account 1 until that account was suspended by the Platform for inappropriate use. Thereafter, MINOR VICTIM 1 communicated with GREENWALD via Greenwald's Platform Account 2 until approximately February 2023.

3. During their conversations, GREENWALD asked MINOR VICTIM 1 to send him, among other things, images and videos of MINOR VICTIM 1 engaging in sexually explicit conduct. MINOR VICTIM 1 complied and sent GREENWALD images and videos of MINOR VICTIM 1 engaging in sexually explicit conduct from MINOR VICTIM 1's Platform account to Greenwald's Platform Account 1 and Greenwald's Platform Account 2.

4. GREENWALD paid MINOR VICTIM 1 for these sexually explicit images and videos via a financial services application. Records obtained from the financial services application established that the payor's account was in GREENWALD's name, under GREENWALD's home address, and that GREENWALD sent numerous payments to MINOR VICTIM 1 from the financial services application ("Greenwald's financial services account").

5. GREENWALD also purchased items from an online marketplace and sent the items directly to MINOR VICTIM 1 for her to wear and/or use in the sexually explicit images and videos GREENWALD enticed, persuaded, and paid MINOR VICTIM 1 to produce, including costumes, lingerie, stuffed

animals, and sex toys. Records obtained from the online marketplace confirmed that the account was in GREENWALD's name, under GREENWALD's address, and that GREENWALD purchased and sent numerous items, including specific sex toys, to MINOR VICTIM 1 from his account on the online marketplace ("Greenwald's marketplace account").

6. By way of example, at GREENWALD's direction and enticement, MINOR VICTIM 1 sent approximately 70 images and videos from her Platform account to GREENWALD's Platform accounts. Records obtained by law enforcement from Greenwald's financial services account and Greenwald's marketplace account establish that funds or goods were sent to MINOR VICTIM 1 corresponding with MINOR VICTIM 1's delivery of the images and videos, including those delivered on the following dates and described, as follows:

- a. On or about May 18, 2022, at approximately 7:11 a.m. Eastern Standard Time ("EST"), GREENWALD messaged MINOR VICTIM 1 from Greenwald's Platform Account 1 requesting a lingerie image from MINOR VICTIM 1. According to Greenwald's financial services account, on May 18, 2022, at approximately 7:13 a.m. EST, GREENWALD sent MINOR VICTIM 1 \$7. Shortly thereafter, MINOR VICTIM 1 responded via the Platform, "Thank you," and, moments later sent Greenwald's Platform Account 1 an image of MINOR VICTIM 1 wearing lingerie.
- b. On or about May 18, 2022, at approximately 2:04 p.m. EST, GREENWALD still communicating from Greenwald's Platform Account 1 advised MINOR VICTIM 1, "I have an oral kink. Do you have stuff where you are sucking or licking something?" and further suggested MINOR VICTIM 1 use her finger to make a video. On that same date, at approximately 2:15 p.m. EST, GREENWALD asked MINOR VICTIM 1 her age and MINOR VICTIM 1 advised she was 16 years old. When MINOR VICTIM 1 inquired whether her being 16 years old was "fine" with GREENWALD, GREENWALD responded, "Heh, yes." Approximately one minute later, GREENWALD asked how long a \$10 video would be, and they agreed to 4 minutes. GREENWALD then replied, "Ok, the other thing I like is dirty talk during. I'm definitely open to tips if it really hits my kinks." Approximately two minutes later, at 2:25 p.m. EST, GREENWALD sent MINOR VICTIM 1 \$10 over Greenwald's financial services account. At approximately 2:52 p.m. EST, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a video of a female believed to be MINOR VICTIM 1 sucking her fingers ("Video A"). The video is recorded from close-up, so while the

subject female's face is not in frame, the female is wearing the same ring and same necklace as MINOR VICTIM 1 is depicted wearing in other videos in which she is clearly identifiable.

- c. On or about May 18, 2022, at approximately 8:57 p.m. EST, GREENWALD from Greenwald's Platform Account 1 sent MINOR VICTIM 1 a video depicting a young woman sucking on her fingers and saying sexually explicit things to the camera. GREENWALD further asked MINOR VICTIM 1 if she would produce a similar video for him. MINOR VICTIM 1 indicated she would make the video and asked GREENWALD what he wanted her to say. GREENWALD responded, suggesting MINOR VICTIM 1 say "Daddy You're so big Cum in my mouth," and asked her for the price of the video. MINOR VICTIM 1 advised the cost was \$10. At approximately 9:03 p.m. EST, GREENWALD sent MINOR VICTIM 1 \$10 from his Greenwald financial services account. In response to receipt of the payment, at approximately 11:40 p.m. EST, MINOR VICTIM 1 sent GREENWALD on Greenwald's Platform Account 1 a video of MINOR VICTIM 1 in lingerie, sucking on her fingers, and talking to the camera ("Video B"), stating, among other things, "Do you like when I do that Daddy?" and "Cum in my mouth and force me to drink it." GREENWALD responded to the video, stating "It looks very good," and "You are such a good girl for doing what daddy asked."
- d. About a half-day later, at approximately 12:49 p.m. EST on or about May 19, 2022, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a still photograph of MINOR VICTIM 1 wearing lingerie but exposing her breasts ("Image A").
- e. Several hours later, at approximately 4:02 p.m. EST on May 19, 2022, MINOR VICTIM 1 sent a message to Greenwald's Platform Account 1 asking if GREENWALD would buy her a "dildo." GREENWALD responded from Greenwald's Platform Account 1 stating that he would purchase the item but that MINOR VICTIM 1 would owe him something and that he would like to see MINOR VICTIM 1 use the gift. Shortly thereafter, GREENWALD advised MINOR VICTIM 1 that he purchased the gift along with a costume and reminded MINOR VICTIM 1, "You would owe me something." When she offered to suck on her finger again, he replied "I would rather see you use your gift."

- f. On or about May 21, 2022, at approximately 1:14 p.m. EST, MINOR VICTIM 1 confirmed receipt of the gift and remarked to GREENWALD that the dildo did not have a suction cup on it as she expected it would. Later on or about May 21, 2022, MINOR VICTIM 1 asked Greenwald's Platform Account 1 for another dildo. GREENWALD responded, "be a good girl this week and ask me again on Friday." Hours later, at approximately 4:04 p.m. EST, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a video of a female believed to be MINOR VICTIM 1 sucking on the dildo GREENWALD had purchased for her. The video records the female subject close-up, only depicting her mouth, nose, and the dildo. GREENWALD then requested more sexually explicit videos from MINOR VICTIM 1, stating "Can you make daddy one more?" "daddy wants to imagine cumming in your mouth," and "Make one more for me to cum to." MINOR VICTIM 1 then sent GREENWALD two additional videos of a female believed to be MINOR VICTIM 1 sucking on the dildo. As with the earlier video, these subsequent videos depicted only a portion of the female subject's face interacting with the dildo. The limited features of the female subject's face in the videos are consistent with MINOR VICTIM 1.
- g. On or about May 21, 2022, at approximately 10:39 p.m. EST, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a video of a female believed to be MINOR VICTIM 1 vaginally penetrating herself with the same dildo taped to the wall. While the face of video's female subject is out of frame, the female subject is wearing a black crop top shirt exposing her breasts. Additionally, the female subject is wearing patches over her nipples with words "FUCK ME" written on them. A review of records from Greenwald's marketplace account indicate that GREENWALD purchased the crop top with nipple patches for MINOR VICTIM 1 on May 19, 2022.
- h. On or about May 24, 2022, at approximately 10:52 p.m. EST, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a video of MINOR VICTIM 1 holding and sucking on the same dildo, up against the same wall as depicted in prior videos ("Video C").
- i. Also on or about May 24, 2022, at approximately 3:15 p.m. EST, GREENWALD from Greenwald's Platform Account 1 suggested to MINOR VICTIM 1 that "I think you could take a bigger toy." The following day, on or about May 25, 2022, MINOR VICTIM 1 asked Greenwald's Platform Account 1 when

he would be able to buy her the bigger toy GREENWALD had promised, even picking out for GREENWALD what she wanted. GREENWALD responded, "Ok, all taken care of baby," and "I know you will do special things for me when you get your gifts." Moments later, MINOR VICTIM 1 replied, "Yes sir."

- j. On or about May 26, 2022, GREENWALD from Greenwald's Platform Account 1 sent MINOR VICTIM 1 a link to track a delivery. On or about May 27, 2022, MINOR VICTIM 1 sent Greenwald's Platform Account 1 messages stating, "DADDY I JUST OPENED THE BOX WITH THE TOY IN IT" and "AND IT CAME WITH A FREE GIFT A VIBRATER." On or about May 27, 2022, at approximately 4:34 p.m. EST, MINOR VICTIM 1 sent Greenwald's Platform Account 1 a video of a female believed to be MINOR VICTIM 1 vaginally penetrating herself with that second gift GREENWALD had purchased for her ("Video D"). While MINOR VICTIM 1's face is out of Video D's frame, her body type and bracelet are clearly visible in the video, and it depicts the same body type and same bracelet as depicted in other videos which clearly identify MINOR VICTIM 1. GREENWALD responded, "Thank you for the sexy ass video," and "It sounds like you like your new toy."

7. In or about June 2023, law enforcement obtained records from a telecommunications provider, including subscriber information for the IP address linked to both Greenwald's Platform Account 1 and Greenwald's Platform Account 2. The IP address was assigned to an account subscribed to GREENWALD, at his residential address in South Amboy, New Jersey ("the South Amboy Residence").

8. On or about January 30, 2024, law enforcement obtained a warrant to search the premises of the South Amboy Residence for evidence relating to child pornography and the enticement of minors to produce sexually explicit material.

9. On or about January 31, 2024, law enforcement executed the warrant and searched the South Amboy Residence. The search recovered, among other devices, a personal computer and three cellular telephones.

10. GREENWALD was present during the search of the South Amboy Residence. GREENWALD agreed to be interviewed by law enforcement inside the South Amboy Residence. During that voluntary, non-custodial interview, GREENWALD stated, among other things, that:

- a. He lived alone at the South Amboy Residence and that he had no visitors;
- b. He was the only person to use his internet, which is secure and password protected;
- c. Greenwald's financial services account is his account;
- d. He recognized MINOR VICTIM 1; and
- e. MINOR VICTIM 1 had communicated her age to him.

11. Law enforcement discovered the following during the search of GREENWALD's cellular telephones:

- a. Image A and Videos A, B, C, and D within a "download" folder in a photos application on one of the cellphones; and
- b. Prepubescent child pornography videos and images on another of the cellphones.

12. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described in Paragraphs 6(a) – (j) 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 and cellular telephone. This is based upon, among other things, (1) the presence of images and videos on GREENWALD's cellular telephones, including Image A and Video A, B, C, and D on one of his telephones; (2) the presence of the Platform on one of his cellular telephones which contained some of the communications with MINOR VICTIM 1; and (3) law enforcement's knowledge that GREENWALD received these images and videos from MINOR VICTIM 1 through the Platform over the Internet.