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

UNITED STATES OF AMERICA : Hon. Tonianne J. Bongiovanni
:
v. : Mag. No. 25-3021 (TJB)
:
JACOB BAUER : **CRIMINAL COMPLAINT**

I, Keven Hendricks, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A


I further state that I am a Task Force Officer 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.

/s/ Keven Hendricks
Keven Hendricks
Task Force Officer
Federal Bureau of Investigation

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1 on
March 31, 2025,
in the District of New Jersey



Hon. Justin T. Quinn, USMJ,
On behalf of
Hon. Tonianne J. Bongiovanni
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Travel with the Intent to Engage in Illicit Sexual Conduct)

Between on or about December 1, 2023 and on or about December 10, 2023, in the District of New Jersey and elsewhere, the defendant,

JACOB BAUER,

a citizen of the United States, did knowingly and intentionally travel in foreign commerce from the United States to Norway, for the purpose of engaging in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(g), that is, in a sexual act with a person under 18 years of age that would be a violation of Chapter 109A of the United States Code if the sexual act had occurred in the special maritime and territorial jurisdiction of the United States, specifically, JACOB BAUER, then aged 27, traveled from the United States to Norway and elsewhere, for the purpose of engaging in a sexual act with Victim-1, a person who had attained the age of 12 years but not 16 years.

In violation of Title 18, United States Code, Section 2423(b).

COUNT TWO

(Engaging in Illicit Sexual Conduct in a Foreign Place)

Between on or about December 1, 2023 and on or about December 10, 2023, the defendant,

JACOB BAUER,

a citizen of the United States, did knowingly travel in foreign commerce from the United States to Norway and elsewhere, and engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(g), that is, in a sexual act with a person under 18 years of age that would be a violation of Chapter 109A of the United States Code if the sexual act had occurred in the special maritime and territorial jurisdiction of the United States, specifically, JACOB BAUER, then aged 27, traveled from the United States to Norway and elsewhere, and knowingly engaged in a sexual act with Victim-1, a person who had attained the age of 12 years but not 16 years.

In violation of Title 18, United States Code, Section 2423(c).

ATTACHMENT B

I, Keven Hendricks, am a Task Force Officer with the Federal Bureau of Investigation. 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. 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 the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. 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.

A. Law Enforcement Informed of Bauer's Illicit Sexual Activity

1. In June 2024, the FBI received an online tip from an individual ("Complainant-1") that a Discord user, initially identified as "Jacob," using the online monikers "Wrath" and "wrath0040," and Discord ID ending in 5259, later identified as the defendant, JACOB BAUER ("BAUER"), was distributing and manufacturing Child Abuse Sexual Material ("CSAM"). Complainant-1 provided messages from the above-mentioned Discord account associated with BAUER dated April 9, 2024 where BAUER discussed having large quantities of CSAM.

2. Law enforcement identified BAUER to be a United States citizen and a resident of New Jersey.

3. Complainant-1 also provided information to the FBI that in or around June 2024, he/she became aware of allegations that BAUER had engaged in sexual acts with a minor female in Norway from other Discord users who were members of the Discord server¹ operated by BAUER (the "Server").

4. Complainant-1 provided information that sometime prior to June 2024, BAUER was "doxxed"² by other Discord users and certain conversations BAUER had with Discord users on the Server were posted publicly on Discord. In particular, two Discord users, "S.G." and "B.C.," posted private conversations that they had with BAUER in which he stated he traveled to Norway to engage in sexual acts with a 14-year-old female in December 2023.

¹ A Discord server is a virtual space for communication using voice, video, and text chat. Discord users are able to create their own Discord servers as a feature of the Discord platform.

² "Doxxing" involves publishing private or identifying information about an individual on the Internet, especially as a form of punishment or revenge. See <https://www.merriam-webster.com/dictionary/dox>

5. Complainant-1 provided the FBI with screen captures of messages on Discord dated April 19, 2024 showing conversations between BAUER and S.G. describing BAUER's sexual acts with a 14-year-old female in Norway ("Victim-1").

BAUER: my gfs are 14 and 17[.] i met and fucked the 14-year-old

S.G.: HE MET UP WITH [Victim-1]

S.G.: WHAY

BAUER: LOL

BAUER: [Victim-1] can confirm that btw

BAUER: lol

BAUER: that's where [Victim-1] lives

BAUER: I don't know if I properly explained this to you

BAUER: I met that other girl I'm dating besides pumpkin

BAUER: I went to norway and fucked her lol

6. In or around April 2024, BAUER deleted his Discord servers and Discord account with ID ending in 5259.

B. Bauer's December 2023 Travel to Norway

7. U.S. Customs and Border Protection confirmed that BAUER traveled to Norway in December 2023. BAUER departed the United States from New York City, New York on or about December 1, 2023 and returned via Newark, New Jersey on or about December 10, 2023. BAUER's itinerary included:

- a. New York City, New York to Paris, France on December 1, 2023;
- b. Paris, France to London, United Kingdom on December 2, 2023;
- c. Manchester, United Kingdom to Oslo, Norway on December 6, 2023; and
- d. Oslo, Norway to Newark, New Jersey on December 10, 2023.

8. Complainant-1 provided law enforcement officers with an email address for BAUER's "ex-girlfriend," an individual residing in the United Kingdom ("Acquaintance-1"). Law enforcement spoke to Acquaintance-1, who provided information regarding BAUER's travel from December 1, 2023 through December 6, 2023. In addition, Acquaintance-1 stated that she assisted BAUER with arranging his travel from the United Kingdom to Norway in December 2023, including helping BAUER book a hotel in Harstad, Norway ("Hotel-1"), and paying for his travel from Oslo, Norway to Tromso, Norway. Acquaintance-1, while disclaiming knowledge of Victim-1's actual identity, believed that Victim-1 resided in Harstad, Norway.

9. Hotel-1 confirmed that BAUER stayed at Hotel-1 from December 6, 2023 through December 9, 2023.

C. Bauer's Conversations Regarding his Illicit Sexual Activity

10. Acquaintance-1 provided law enforcement officers with information regarding the Discord account ("Discord Account-1") belonging to BAUER's "online girlfriend" ("Acquaintance-2"). Chat messages on Discord provided by Acquaintance-1 revealed that Acquaintance-2, using Discord Account-1, may have introduced BAUER to Victim-1 via Discord or another online chat service.

11. Discord Account-1 was associated with a residence in the State of Georgia. On or about August 8, 2024, law enforcement officers visited the Georgia residence. Acquaintance-2, in the presence of an adult guardian³, admitted that Discord Account-1 was his/hers. Law enforcement officers obtained Acquaintance-2's cellphone and received consent from a lawful guardian of Acquaintance-2 to search it.

12. Pursuant to the search of Acquaintance-2's cellphone, law enforcement officers obtained, among other things, historically deleted Discord chats between Acquaintance-2, using Discord Account-1, and BAUER on his since-deleted Discord account (the account mentioned in paragraph 6, above) in which BAUER discussed his sexual acts with Victim-1. BAUER also relayed that Victim-1's age made it difficult for Victim-1 and BAUER to go out in public while he was with her in Norway.

13. In additional Discord chat messages, BAUER sent Acquaintance-2 photographs of Victim-1 while Victim-1 was inside of Hotel-1. One of the photographs was of Victim-1 covering her face with a pillow and showed furniture matching the furniture displayed on the website for Hotel-1.

³ Acquaintance-2 was a minor at the time of his/her interaction with law enforcement officers but is no longer a minor.

D. Law Enforcement's Identification of Victim-1

14. Acquaintance-1 and Acquaintance-2 provided law enforcement officers with several of Victim-1's suspected social media account monikers. Acquaintance-2 provided Victim-1's Discord account number, "Discord Account-2."

15. Upon receipt of the social media account monikers for Victim-1, law enforcement officers issued subpoenas for information associated with these monikers to SnapChat, Discord, and X (formerly known as "Twitter"), respectively. The subpoena responses from SnapChat, Discord, and X all provided a common phone number associated with the online monikers.

16. Further, the subpoena response from Snapchat provided Internet Protocol ("IP") data and system architecture indicative of an Apple device. Accordingly, Law enforcement officers issued a subpoena to Apple for information associated with the phone number from the SnapChat, Discord, and X subpoena returns.

17. On September 12, 2024, Apple returned information that an account linked to the common phone number belonged to a citizen of a foreign country ("Individual-1") residing at a particular address in Harstad, Norway ("Address-1"). Address-1 is less than two miles from Hotel-1.

18. Law enforcement officers learned that Individual-1 had a minor daughter whose name matched the identifiers in the provided social media monikers affiliated with Victim-1, and whose age in December 2023, 14, matched the age of Victim-1 as described by BAUER.

19. Law enforcement officers in Norway confirmed that Individual-1 and Victim-1 reside at Address-1.

20. On or around October 30, 2024, Acquaintance-1 provided law enforcement officers with a screen capture of a message that she received from a Discord user with the display name of "wrath," and asking Acquaintance-1 to have a "short conversation" with him. Acquaintance-1 relayed to law enforcement that she believed that this was another of BAUER's Discord accounts ("Discord Account-3").

E. Law Enforcement Interview with Victim-1

21. On or about February 20, 2025, law enforcement officers in Norway interviewed Victim-1.

22. Victim-1 reported that she and BAUER had been in contact via the Internet for approximately one year before they met in person. Victim-1 stated that she communicated with BAUER over Discord and other online platforms.

23. Victim-1 reported that she met BAUER at Hotel-1 on two occasions. On both occasions, Victim-1 reported engaging in sexual intercourse with BAUER.

24. In addition, while at Hotel-1, Victim-1 stated that BAUER took a photograph of her where she covered her face with a pillow.

25. Victim-1 described BAUER's appearance to the law enforcement officers, and, after being shown a photograph of BAUER by law enforcement officers, confirmed the person in the photograph to be BAUER.

F. The February 2025 Search Warrant

26. On February 27, 2025, the Honorable Justin T. Quinn, United States Magistrate Judge, authorized a search warrant to Discord, Inc, for information related to Discord Account-1, Discord Account-2, and Discord Account-3. *See* 25-mj-6020 (JTQ).

27. Information obtained as a result of the search warrant confirmed that Bauer used his previously deleted Discord account to communicate with Victim-1 about his illicit sexual activity with Victim-1. His chats also indicate knowledge of Victim-1's age and status as a minor. BAUER also expressed interest in making another trip to Norway to visit Victim-1, while at the same time acknowledging the risk associated with being seen in public with Victim-1.

28. The results of the search warrant also revealed that beginning on or before October 3, 2024 through at least February 17, 2025, BAUER used another Discord account ("Discord Account-4") to communicate with Victim-1 regarding his prior illicit sexual activity with her and continued desire for illicit sexual activity with Victim-1.