
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III, U.S.M.J.
v. : Mag. No. 20-12398
RYAN LEE : **CRIMINAL COMPLAINT**

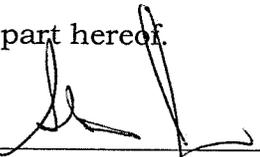
I, Stephen Jamison, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 page and made a part hereof.



Stephen Jamison, Special Agent
Federal Bureau of Investigation

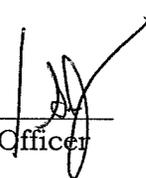
Special Agent Jamison attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

October 19, 2020
Date

at New Jersey
State

Honorable James B. Clark, III
United States Magistrate Judge
Name and Title of Judicial Officer

James B. Clark III
Signature of Judicial Officer



ATTACHMENT A

COUNT ONE
(Attempted Enticement of a Minor)

From on or about October 15, 2020 through on or about October 17, 2020, in the District of New Jersey, and elsewhere, the defendant,

RYAN LEE,

did knowingly use a facility of interstate and foreign commerce to attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, namely, production of child pornography, in violation of Title 18, United States Code, Sections 2251(a) and (e) and Title 18, United States Code, Section 2.

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

COUNT TWO
(Attempted Transfer of Obscene Materials to Minors)

From on or about October 15, 2020 through on or about October 17, 2020, in the District of New Jersey, and elsewhere, the defendant,

RYAN LEE,

did use the Internet, a facility and means of interstate or foreign commerce to knowingly attempt to transfer obscene matters to an individual who the defendant believed to be under the age of sixteen, that is, he believed to be a thirteen year old female, knowing that such female had not attained the age of sixteen.

In violation of Title 18, United States Code, Sections 1470 and 2.

ATTACHMENT B

I, Stephen Jamison, 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 discussions with other law enforcement officers, and my review of reports, documents, and other 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 the sole purpose of establishing probable cause to support the issuance of a complaint, 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. In or around mid-October 2020, an undercover law enforcement officer ("UC-1"), was monitoring a group chat that was intended for teenagers on a web-based application known to be utilized by individuals who sexually exploit children ("Application-A"). UC-1 utilized the first name "Sharon" for this profile.

2. On or about October 15, 2020, "Sharon" received a private message on Application-A from "RyanLee58" subsequently determined to be Ryan Lee ("LEE"). LEE messaged "Sharon" without any prior conversation between the pair. LEE introduced himself as a 26 year old male from Trenton, New Jersey and asked to see a photograph of "Sharon." "Sharon" responded that she was a 13-year-old female located in Somerset County, New Jersey.

3. LEE and "Sharon" continued communicating on Application-A during the following days. During these communications, LEE sent "Sharon" multiple photographs of his face, thus confirming his identity. During this same time period, LEE requested nude photographs from "Sharon." For instance in a series of messages, LEE asked to see Sharon's "boobs," "butt," and "spot," presumably referring to Sharon's vagina. Shortly thereafter, LEE sent a photograph of his erect penis and a video of another individual masturbating LEE's penis to "Sharon," with a message stating "[t]hat [is] mine and video is my friend jerking me." The following day, LEE stated "you got nude pics," seemingly requesting nude photographs again. The conversation continued until the pair transferred the conversation onto a different web-based application that allows for chat and voice-to-voice communications ("Application-B").

4. During the conversations on Application-B, LEE continued requesting nude photographs of "Sharon," on one occasion stating "can I see your pussy"? LEE then sent "Sharon" a photograph of his erect penis. LEE then asked "Sharon" about her sexual experiences and stated "yeah I need a bj bad," referring to oral sex. The pair then agreed to meet in Somerville, New

Jersey, with LEE stating that he would take an Uber from Trenton to the prearranged location in Somerville.

5. Law enforcement conducted physical and electronic surveillance of the intended location of the meeting in Somerville. Shortly thereafter, law enforcement observed LEE enter the area, wearing clothing that matched the description that he had given to "Sharon." Law enforcement approached LEE and arrested him without incident.

6. Law enforcement advised LEE of his Miranda rights, which LEE agreed to waive. In a video-recorded statement, LEE indicated that he had travelled from Trenton in order to meet with Sharon, a female minor for sex. LEE stated that the minor with whom he intended to meet had advised him that she was thirteen years old.