

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Magistrate No. 21-13337  
 :  
 TRENT COLLIER :

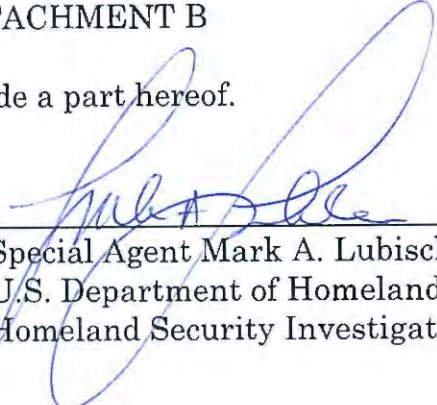
I, Mark A. Lubischer, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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.

  
\_\_\_\_\_  
Special Agent Mark A. Lubischer  
U.S. Department of Homeland Security  
Homeland Security Investigations

SA Lubischer attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A), on September 29, 2021 in the District of New Jersey

HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

<sup>For</sup>  
LEDA DUNN WETTRE  
Signature of Judicial Officer



**ATTACHMENT A**

(Possession of Child Pornography)

On or about September 28, 2021, at Newark Liberty International Airport, in the District of New Jersey, and elsewhere, defendant

**TRENT COLLIER**

did knowingly possess, and knowingly access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and Section 2.

## ATTACHMENT B

I, Mark A. Lubischer, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations. 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 evidence. Where statements of others are related herein, they are related in substance and 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. 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.

1. At all times relevant to this Criminal Complaint, defendant TRENT COLLIER was a resident of Kearny, New Jersey and a caseworker employed by the New Jersey Department of Children and Family Services, Division of Child Protection and Permanency.

2. On or about September 28, 2021, COLLIER arrived at Newark Liberty International Airport aboard a flight from the Dominican Republic.

3. Upon his arrival, law enforcement conducted a lawful search of the luggage in COLLIER's possession. Law enforcement located a tablet device and a cellular phone. Law enforcement conducted forensic searches of both devices.

4. Upon searching the cellular phone, law enforcement identified at least two images of child pornography depicting the genitals of prepubescent children. One image depicts a fully nude prepubescent boy and fully nude prepubescent girl on a bed. The boy appears to have an erect penis, and the girl is holding it. The second image depicts a nude adult woman lying on a bed with a fully nude prepubescent girl. The woman is touching the girl's genitalia. Based on an analysis of the phone, COLLIER sent these images via WhatsApp message.

5. COLLIER was advised of his *Miranda* rights and he waived those rights in writing. He gave law enforcement a recorded statement. COLLIER admitted that he had previously sent a video and images of child pornography to at least one other individual using his cellular phone and that that individual also sent child pornography to COLLIER's cellular phone.

6. Based on my education, training, and experience, and to the best of my knowledge, the images described in paragraph 4 above were transported in interstate commerce because they were transmitted via the WhatsApp application.