

FILED

DEC 18 2025

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:00 AM
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA : Hon. Michael A. Shipp
: :
v. : Crim. No. 25-797
: :
DAVID TUYTJENS : 18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey, sitting at Trenton, charges as follows:

On or about December 13, 2024, in Hunterdon County, in the District of New Jersey, and elsewhere, the defendant,

DAVID TUYTJENS,

did knowingly possess and attempt to possess a SanDisk UltraPlus 64GB MicroSD Card, which contained at least 800 images and videos of child pornography, including an image involving a prepubescent minor and a minor who had not attained 12 years of age, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, 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 which images were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, after having previously been convicted of an offense under the laws of the State of New Jersey relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor,

and after having previously been convicted of an offense under Chapter 110 in Title 18 of the United States Code.

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

FORFEITURE ALLEGATIONS

As a result of committing the offense alleged in this Indictment, the defendant,

DAVID TUYTJENS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all of defendant TUYTJENS' right, title and interest in the following:

- a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260;
- b. all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- c. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Indictment, and all property traceable to such property; and
- d. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property.

The property to be forfeited includes, but is not limited to, all of TUYTJENS' right, title, and interest in the following items:

- a. One (1) Lenovo Thinkpad Laptop (the "Laptop") seized from TUYTJENS' bedroom dresser.
- b. One (1) SanDisk UltraPlus 64GB MicroSD Card located inside of the Laptop.
- c. One (1) USB flash drive seized from TUYTJENS' vehicle.
- d. One (1) USB flash drive seized from TUYTJENS' bedroom nightstand in his residence.
- e. One (1) SD Card Adapter seized from TUYTJENS' bedroom nightstand in his residence.

- f. One (1) flip-phone style cellphone seized from TUYTJENS' sitting room in his residence.
- g. One (1) USB flash drive seized from TUYTJENS' television monitor in his residence.

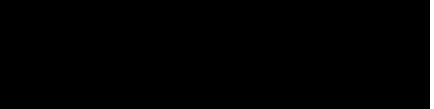
SUBSTITUTE ASSETS PROVISION

If any of the forfeitable property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL


FOREPERSON

TODD BLANCHE
United States Deputy Attorney General

PHILIP W. LAMPARELLO
Senior Counsel

/s/ Jonathan S. Garelick
Assistant U.S. Attorney

Approved:

/s/ R. David Walk, Jr.
Deputy U.S. Attorney

CASE NUMBER: 3:25-CR-797 (MAS)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

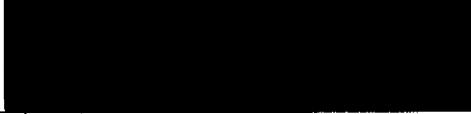
v.

DAVID TUYTJENS

INDICTMENT FOR

18 U.S.C. §§ 2252A(a)(5)(B)&(b)(2)

A True Bill,


Foreperson

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UNITED STATES DEPUTY ATTORNEY GENERAL
PHILIP W. LAMPARELLO
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