

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY

United States of America
v.
GERRETT CONOVER

Case No.
12-2080 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2010 to Sept. 18, 2012 in the county of Gloucester in the
District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 2522A(a)(2)(A)
and 18 U.S.C. Section 2

Receipt and distribution of child pornography, see Attachment A

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

Gady Bishop
Complainant's signature

GADY BISHOP, Special Agent HSI
Printed name and title

Sworn to before me and signed in my presence.

Date: 09/20/2012

Joel Schneider
Judge's signature

City and state: Camden, New Jersey

HON. JOEL SCHNEIDER, U.S. Magistrate Judge
Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

By:  _____

DIANA VONDRA CARRIG, Assistant U.S. Attorney

Date: September 20, 2012

ATTACHMENT A

From in or about October 2010 through on or about September 18, 2012, at Woolwich Township, in Gloucester County, in the District of New Jersey and elsewhere, the defendant

GERRETT CONOVER

did knowingly receive and distribute more than 10 graphic images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been downloaded to his computer, each of which had been transported in interstate commerce by means of computer.

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

ATTACHMENT B

1. I, Gady Bishop, Special Agent with the Homeland Security Investigations (“HSI”), within the United States Department of Homeland Security (“DHS”), have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not necessarily included each and every fact known to the government concerning this investigation.
2. On or about April 26, 2012, during the course of a child exploitation investigation initiated by HSI Agents in Boston, law enforcement officers discovered numerous Yahoo messenger chats from one of the laptops used by the Boston Agents’ main target (hereinafter referred to as “RD”). Those chat logs contained messages and file transfers between RD and numerous unidentified individuals discussing the exploitation of children. In reviewing the chats, agents discovered that RD chatted with an individual using the screen name ‘petersneaks,’ during which RD and ‘petersneaks’ discussed their mutual sexual attraction to children, their desire to perform oral sex on children, and comments of a sexual nature pertaining to files that they had been sharing.
3. Boston Agents determined that RD and ‘petersneaks’ exchanged or attempted to exchange approximately 41 images and videos.
4. Leads from the Boston case, including information provided by RD, have resulted in approximately 45 arrests to date, and the identification of approximately 151 children who had been victimized by the various individuals involved.
5. On or about May 3, 2012, Boston Agents interviewed RD. During that interview, RD made the following statements, in substance and in part, regarding ‘petersneaks:’
 - a. RD traded child pornography with ‘petersneaks’ for a period of two to three years. RD stated that the images he received from ‘petersneaks’ were ones RD had never seen before.
 - b. ‘Petersneaks’ traded child pornography via Yahoo instant messenger, MSN Messenger, Gigatribe (a peer-to-peer network) and other programs.
6. In a computer chat between RD and ‘petersneaks’ recovered from one of RD’s computers and dated on or about October 22, 2010, ‘petersneaks’ stated that ‘petersneaks’ ordered “new plastic pants from Fetware.com and some Velcro/plastic diapers, and five pairs of plastic pants on Ebay.”
7. Boston agents began to attempt to identify ‘petersneaks’ by various means, including by

conducting internet searches and issuing subpoenas, and were able to identify 'petersneaks' as the defendant GERRETT CONOVER of Woolwich Township, New Jersey.

8. On or about May 7, 2012, the investigation into 'petersneaks' was transferred from the Boston HSI office to the Cherry Hill HSI office.
9. On or about May 8, 2012, HSI Boston agents provided me with a disk containing approximately 19 images and one video identified in the chats between RD and 'petersneaks,' from files retrieved from RD's laptop. All the images were of prepubescent boys, including a series of images of a young boy in a diaper, and others of young boys exposing their genitals. The video was sent by CONOVER to RD, and was dated November 6, 2010, and was titled "Preteen BJ.avi." The video is approximately two minutes and forty-seven seconds long and depicts a prepubescent boy (approximately 10 years old) lying nude on a bed with an erect penis while an adult male performs oral sex on the boy.
10. A review of the Yahoo messenger chats between RD and 'petersneaks' provided by HSI Boston to this affiant revealed there were approximately 18 file transfers containing images or videos. Although the images are not viewable by reviewing the chats, the responses, by either RD or CONOVER, appear to involve sexual content, including some references to young boys. For example:
 - a. In a chat dated October 22, 2010, CONOVER sent to RD a file titled P7070060.jpg, to which RD responded, "love the scoobys....a perfect penis." CONOVER responded, "dunno about perfect...it works tho." RD then stated, "that's why its perfect...awesome shape...not to [sic] long...nice head to lick all around like ice cream." CONOVER responded, "haha not hardly 4 ½ ... 11y/o boys have longer penises.... I'm licking the Osiris [a type of skateboarding sneaker] I got from a 12 y/o."
 - b. In a chat dated November 7, 2010, CONOVER stated he had a "good thing going with a cute Asian guy a while back but I blew it." CONOVER then sent RD a file with the name Picture 010.jpg, and stated, "this is a boy i liked, and vice versa, but he moved away....i gave him sneakers....i tried to keep him permanently...he was nearly perfect...small and into kink...is not easy to find one so compatible." [The file transfer is believed to be a picture of the boy CONOVER referred to in this chat.]
 - c. In another chat retrieved from RD, CONOVER stated he was "wanting to go outside fully diapered...to be noticed at the mall...last night i was outside in just a diaper...out front [of his house]...i nearly cum whenever I do that...i soooo wish my neighbors son sees me...hes like 14." CONOVER added, "i perved on a kid

on Youtube” and stated he wanted to “hang out at Kids Footlocker and watch boys like Liam try on tiny sneakers.”

11. Based upon the investigation, I entered a lookout on GERRETT CONOVER into the HSI database Treasury Enforcement Communication System (“TECS”). Pursuant to that entry, on or about September 16, 2012, at approximately 1:00 p.m., I received information from HSI Special Agent Jason Young out of Massena, New York, that CONOVER had been arrested at the Ogdensburg, New York port of entry coming into the United States from Canada. Special Agent Young stated that CONOVER had been stopped at the border of the United States from Canada, and was subjected to a secondary examination.
12. During that secondary examination, Customs and Border Protection (“CBP”) officers discovered an Acer laptop belonging to CONOVER, and Special Agent Young and computer forensic agent Tim Losito responded to the border and conducted a border search of the laptop. The search revealed that the hard drive of CONOVER’s laptop contained a video file, under user “Gerrett,” folder “Videos,” subfolder “Real Player Videos,” filename “13yrOldGetsDressed.flv,” which depicted a boy of approximately 12/13 years of age taking his clothes off in front of a web camera.
13. On or about September 16, 2012, after advising CONOVER of his Miranda rights and obtaining a waiver of such rights, New York agents interviewed CONOVER, who stated the following, in substance and in part:
 - a. CONOVER admitted that the Acer laptop found in his vehicle belonged to him, was his home computer and further stated that no one else has access to it.
 - b. CONOVER acknowledged knowing about the video that was found on his Acer laptop entitled “13yrOldGetsDressed.flv,” described in paragraph 12 above.
 - c. CONOVER stated that he has another computer at his home upon which he backs up his computer data.
 - d. CONOVER lives alone at his home in Woolwich Township.
14. On September 16, 2012, CONOVER was charged in the Northern District of New York with Importation or Transportation of Obscene Matters, in violation of Title 18, United States Code, Section 1462, and possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B). On or about September 18, 2012, CONOVER had a bail hearing in New York and was released on \$50,000, secured by cash, and on electronic monitoring.
15. On or about September 17 and 19, 2012, United States Magistrate Judge Karen M.

Williams issued search warrants on CONOVER's Woolwich Township home. Other agents and I executed those search warrants and seized many items, including electronic equipment, computers (including an Acer Laptop Serial Number LXT53051244420260BEM01) and hard drives.

16. Pursuant to the authority granted in the September 17, 2012 search warrant issued by Magistrate Judge Williams, on or about September 18, 2012, agents conducted a cursory examination of the Acer Laptop computer seized from CONOVER's home on September 17, 2012. During that examination, agents determined that the Acer Laptop contained at least 10 images of child pornography. That same day, I reviewed at least 10 images of child pornography recovered from CONOVER's Acer laptop. The following is a sample of the images that I reviewed:
 - a. **10an12-1(1)** – JPG file image of a naked prepubescent male sitting alongside a naked adult male. The leg of the prepubescent male is straddling the leg of the adult male while the prepubescent male is masturbating the penis of the adult male.
 - b. **3 kid play** – JPG file image of three naked prepubescent boys lying on a bed. One prepubescent male is lying on his back with his legs spread over the shoulders of a second prepubescent male. The second prepubescent male is straddling the prepubescent male lying on his back in a manner to suggest the second prepubescent male has penetrated the anus of the prepubescent male lying on his back with his penis. The third naked prepubescent male is lying on his back in the same bed with a fully erect penis.
 - c. **!1stday_1** - JPG file image of a young male approximately ten to twelve years old performing oral sex on the erect penis of an adult male.
17. On or about September 19, 2012, I received the following information from HSI Special Agent Jason Young in Massena, New York, in substance and in part:
 - a. While examining the contents of CONOVER's laptop computer that had been seized from CONOVER in New York on September 16, 2012, Young found:
 - i. More than 50 images of child pornography;
 - ii. A record of a chat room conversation in which CONOVER, using the screen name "petersneaks," stated in substance and in part to another person that:
 - (1) CONOVER had a "close relationship" with a Boy Scout he referred to as "T," which lasted between the time the boy was 10

and 17 years of age.

- (2) In response to a question about how CONOVER was able to find privacy with the boy, CONOVER replied that CONOVER took the boy to his house, his office, after most Scout meetings, and on some four-day road trips, during which they stayed in a hotel.
 - (3) CONOVER stated that he left the Boy Scouts about eight years ago because he realized that he loved "T" and that other boys did not mean anything to him. CONOVER further stated that he last saw "T" about a year ago.
 - (4) When asked if CONOVER had any other boys after "T," CONOVER replied just a few, just for some fun times.
18. During the execution of the search warrants on September 17 and 19, 2012, agents also seized many items indicating CONOVER's participation as a leader in the Boy Scouts during the time period from in or about 1990 through 2000, including:
 - a. A shoebox full of photographs depicting: (i) CONOVER in a Boy Scout uniform; (ii) numerous boys in Boy Scout uniforms; and (iii) CONOVER and Boy Scouts engaging in various activities, such as camping and canoeing. Some of the photographs had date and place labels, such as "Maine 8/99;" "Scouts - first aid meet 2-00;" and "Summer camp '91 Cape Hatteras."
 - b. A manila folder labeled "Scouts," which contained various papers and postcards.
 - c. A Boy Scout Handbook.
 - d. Approximately four boxes filled with photographic slides also depicting Boy Scouts and Scouting activities.
 - e. Newspaper clippings concerning the Boy Scouts.
19. Based upon my education, training, and experience, my discussions with other law enforcement officers, and this investigation, the video and images contained in CONOVER's Acer laptops were transported in interstate commerce by means of computer when they were downloaded to his computer, and also were produced using materials that were shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer.