

UNITED STATES DISTRICT COURT
 for the
DISTRICT OF NEW JERSEY

United States of America)
 v.)
 CHARLES WESLEY BUSH,) Case No. Mag. No. 18-5508 (KMW)
 a.k.a. "Wes")
)
)
)
)

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 April 19, 2017 in the county of Burlington in the
 District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1) and Title 18, United States Code, Section 2;	Distribution of child pornography; Conspiracy to distribute child pornography; and Possession of child pornography on federal property. (See Attachment A)
Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2) and Title 18, United States Code, Section 2	

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.


 Kevin P. Matthews
Complainant's signature

Kevin P. Matthews, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 02/02/2018


 Hon. Karen M. Williams, U.S. Magistrate Judge
Judge's signature

City and state: Camden, New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

ATTACHMENT A

Count 1

(Conspiracy to Distribute Child Pornography)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendants

CHARLES WESLEY BUSH,
a.k.a. "Wes," and
WILLIAM H. NOBLE,
a.k.a. "Bill,"

did knowingly and intentionally conspire with each other and with others, known and unknown, to distribute material containing child pornography that had been mailed, and using any means and facility of interstate or foreign commerce, shipped and transported in, and affecting interstate and foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).

Count 2

(Distribution of Child Pornography)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

CHARLES WESLEY BUSH,
a.k.a. "Wes,"

did knowingly and intentionally distribute material containing child pornography that had been mailed, and using a means and facility of interstate and foreign commerce, shipped and transported in, and affecting interstate and foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1) and Title 18, United States Code, Section 2.

Count 3
(Possession of Child Pornography on Federal Property)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

**CHARLES WESLEY BUSH,
a.k.a. "Wes,"**

while a sentenced inmate of Federal Correction Institution, Fort Dix, did knowingly and intentionally possess child pornography, in the special territorial jurisdiction of the United States, and on any land or building owned by, leased to, or otherwise used by or under the control of the United States Government, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

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

UNITED STATES DISTRICT COURT
 for the
DISTRICT OF NEW JERSEY

United States of America)
 v.)
 WILLIAM H. NOBLE,) Case No. Mag. No. 18-5507(KMW)
 a.k.a. "Bill")
)
)
)
)

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 April 19, 2017 in the county of Burlington in the
 District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1) and Title 18, United States Code, Section 2;	Distribution of child pornography; Conspiracy to distribute child pornography; and Possession of child pornography on federal property. (See Attachment A)
Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2) and Title 18, United States Code, Section 2	

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.


 Kevin P. Matthews
Complainant's signature

Kevin P. Matthews, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 02/02/2018


 Hon. Karen M. Williams, U.S. Magistrate Judge
Judge's signature

City and state: Camden, New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

ATTACHMENT A

Count 1

(Conspiracy to Distribute Child Pornography)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendants

WILLIAM H. NOBLE,
a.k.a. "Bill," and
CHARLES WESLEY BUSH,
a.k.a. "Wes,"

did knowingly and intentionally conspire with each other and with others, known and unknown, to distribute material containing child pornography that had been mailed, and using any means and facility of interstate or foreign commerce, shipped and transported in, and affecting interstate and foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1).

Count 2

(Distribution of Child Pornography)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

WILLIAM H. NOBLE,
a.k.a. "Bill,"

did knowingly and intentionally distribute material containing child pornography that had been mailed, and using a means and facility of interstate and foreign commerce, shipped and transported in, and affecting interstate and foreign commerce, by any means, including by computer, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1) and Title 18, United States Code, Section 2.

Count 3
(Possession of Child Pornography on Federal Property)

On or about April 19, 2017, in Burlington County, in the District of New Jersey and elsewhere, defendant

WILLIAM H. NOBLE,
a.k.a. "Bill,"

while a sentenced inmate of Federal Correction Institution, Fort Dix, did knowingly and intentionally possess child pornography, in the special territorial jurisdiction of the United States, and on any land or building owned by, leased to, or otherwise used by or under the control of the United States Government, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

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

UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY

United States of America)
v.)
JACOB S. GOOD) Case No. Mag. No. 18-5506 (KMW)
)
)
)
)
)

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 November 1, 2016 in the county of Burlington in the
District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2);	Possession of child pornography on federal property; and Access with intent to view child pornography on federal property. (See Attachment A)

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.


Complainant's signature

Kevin P. Matthews, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/02/2018


Judge's signature

City and state: Camden, New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge
Printed name and title

ATTACHMENT A

Count 1
(Possession of Child Pornography on Federal Property)

On or about November 1, 2016, in Burlington County, in the District of New Jersey and elsewhere, defendant

JACOB S. GOOD,

while a sentenced inmate of Federal Correction Institution, Fort Dix, did knowingly and intentionally possess child pornography, in the special territorial jurisdiction of the United States, and on any land or building owned by, leased to, or otherwise used by or under the control of the United States Government, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

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

Count 2
(Accessing with Intent to View Child Pornography on Federal Property)

On or about November 1, 2016, in Burlington County, in the District of New Jersey and elsewhere, defendant

JACOB S. GOOD,

while a sentenced inmate of Federal Correction Institution, Fort Dix, did knowingly and intentionally access with intent to view child pornography, in the special territorial jurisdiction of the United States, and on any land or building owned by, leased to, or otherwise used by or under the control of the United States Government, after having been previously convicted of offenses under Chapter 110 of Title 18 of the United States Code.

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

CONTENTS APPROVED
ACTING UNITED STATES ATTORNEY

By: /s/ Gabriel J. Vidoni
Gabriel J. Vidoni, Assistant U.S. Attorney

Date: February 2, 2018

ATTACHMENT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES

v.

JACOB S. GOOD,
WILLIAM H. NOBLE, a.k.a. "Bill" and
CHARLES WESLEY BUSH, a.k.a. "Wes"

Mag. No.: 18-5506 (KMW)
Mag. No.: 18-5507 (KMW)
Mag. No.: 18-5508 (KMW)

**AFFIDAVIT OF SPECIAL AGENT KEVIN P. MATTHEWS IN SUPPORT OF
CRIMINAL COMPLAINTS AND ARREST WARRANTS**

I, Kevin P. Matthews, a Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, aver as follows:

1. I have been an FBI agent since 2005. Since May 2009, I have been assigned to the FBI's Innocent Images National Initiative ("National Initiative"), which investigates individuals suspected of being involved in the online sexual exploitation of children. I have received training in the area of child pornography (as defined in 18 U.S.C. § 2256) and child exploitation, and have, as part of my daily duties as a Special Agent assigned to the National Initiative, investigated violations relating to child exploitation and child pornography, including violations pertaining to the possession, distribution, receipt, advertising and production of child pornography, in violation of Title 18, United States Code, Sections 2251, 2252, 2252A and 2423. I have observed and reviewed numerous examples of child pornography in all forms of media, including computer media. I have participated in the execution of many search warrants involving child exploitation and/or child pornography offenses. I have also been trained in the investigation of persons using various computer networks to connect with others on the Internet. As a federal agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

2. I make this Affidavit in support of an application for criminal complaints and arrest warrants. The criminal complaints charge the defendants with the following violations of federal law (collectively, the "Subject Offenses"):

- a. Distribution of child pornography – *i.e.*, knowingly distributing material containing child pornography in and affecting interstate or foreign commerce – in violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1);
- b. Conspiracy to distribute child pornography in violation of Title 18, United States Code, Section 2252A(a)(2)(B) & (b)(1);
- c. Possession of child pornography on federal property – *i.e.*, knowingly possessing

child pornography on land under the control of the United States Government – in violation of Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2).

- d. Access with intent to view child pornography on federal property – *i.e.*, knowingly accessing with intent to view child pornography on land under the control of the United States Government – in violation of Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2).

3. For the reasons described in more detail below, there is probable cause to believe that the defendants have committed the charged **Subject Offenses**.

4. The information below is based upon the investigation I have conducted, my personal knowledge and observations, my training and experience, my conversations with other law enforcement officers (including, but not limited to officers who have engaged in numerous investigations involving child pornography and computer-based crime), and the review of documents and records, and other information shared with me by others.

5. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of criminal complaints and arrest warrants, I have not included each and every fact known to me concerning this investigation. Rather, I have only included information necessary to establish probable cause for issuance of the complaints and warrants. Except as otherwise indicated, the actions, conversations, and statements of others identified in this Affidavit – even where they appear in quotations – are reported in substance and in part.¹ Similarly, dates and times are approximations, and should be read as having taken place on or about, in or about, or at or about the date or time provided.

BACKGROUND

The Federal Bureau of Prisons and Federal Correctional Institution Fort Dix

6. The Federal Bureau of Prisons (“BOP”) administers the federal system of correctional institutions for sentenced federal prisoners in the United States. The BOP, according to its website, seeks to “protect public safety by ensuring that federal offenders serve their sentences of imprisonment in facilities that are safe, humane, cost-efficient, and appropriately secure, and provide reentry programming to ensure their successful return to the community.”²

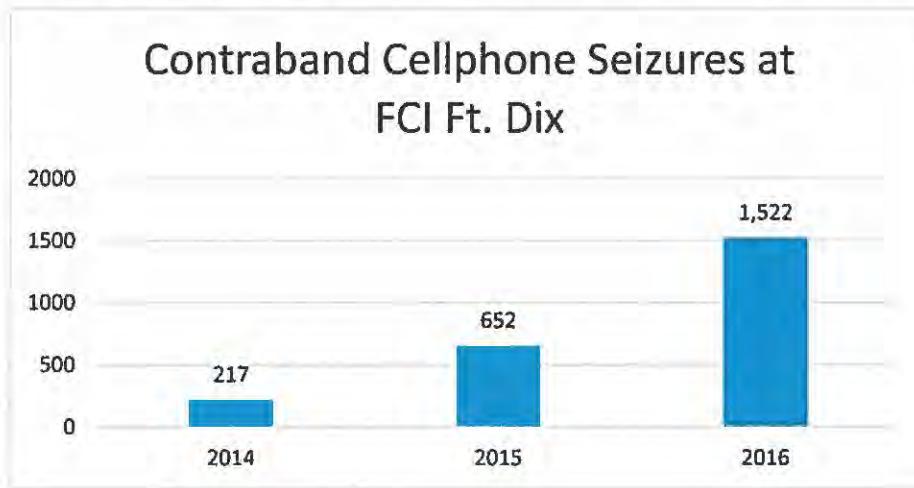
7. One such institution is Federal Correctional Institution Fort Dix (“FCI Ft. Dix”), which is “[a] low security federal correctional institution with an adjacent minimum security

¹ Excerpts of recorded conversations provided below fairly reflect the content of the conversations based upon draft transcripts, but final versions have not yet been completed and therefore the drafts are subject to further revision.

² See BOP Website, *available at* <https://www.bop.gov/about/agency/> (last visited January 31, 2018).

satellite camp,”³ located in Burlington County, New Jersey. FCI Ft. Dix houses 4,399 male offenders, with the correctional institution itself housing approximately 4,072 inmates, and an additional 327 inmates in the adjacent satellite camp.⁴

8. According to FCI Ft. Dix’s internal administrative regulations, the possession, by an FCI Ft. Dix inmate, of a “portable telephone, pager, or other electronic device” is among the “greatest severity level prohibited acts” at FCI Ft. Dix, second only to acts of killing, assault, certain kinds of escape, setting fires, possessing weapons, rioting or encouraging rioting, or taking hostages.⁵ As a “Greatest severity level prohibited act,” the possession of such an electronic device subjects the offender to internal discipline. Notwithstanding this fact, in recent years the seizures of contraband cellphones at FCI Ft. Dix have increased dramatically. As represented in the chart below, which is based upon data provided by the Special Investigations Unit, cellphone seizures in 2016 reached a total of, on average, more than one cellphone for every one out of three inmates:



9. The possession of a cellular telephone in a federal correctional institution is a federal misdemeanor offense punishable by up to one year in prison under Title 18, United States Code, Section 1791(a)(2) and (b)(4).

10. The use of a cellphone and computer media to distribute images of child pornography (“CP”), constitute separately punishable federal criminal offenses.

³ See BOP Website, available at <https://www.bop.gov/locations/institutions/ftd/> (last visited January 31, 2018).

⁴ *Id.*

⁵ See FCI Fort Dix Admissions & Orientation (A&O) Handbook at 42, available at https://www.bop.gov/locations/institutions/ftd/FTD_aohandbook.pdf (Apr. 2016 rev.) (last visited January 31, 2018).

PROBABLE CAUSE

The FCI Ft. Dix Child Pornography Network

11. In approximately January 2016, Witness 1 (“W-1”), an inmate at FCI Ft. Dix serving a sentence for bank robbery, provided information to the FBI after the BOP disciplined W-1 for possessing a thumb drive – *i.e.*, a removable storage device capable of storing large amounts of digital information. Upon examination, the thumb drive contained CP. W-1 explained that in about August 2015 he had been keeping the thumb drive for another inmate, Anthony Craig **Jeffries**, at **Jeffries**’ request. W-1 stated that he did not know the device contained CP, and said that **Jeffries** had told W-1 to say that W-1 had simply found the device and was going to throw it away if anyone questioned W-1 about the device. W-1 further explained that **Jeffries** worked in the computer unit and could not bring the device in and out with him. W-1 said that he stored the device above an air conditioning unit for **Jeffries**, giving **Jeffries** access to the device between 7:30 a.m. and 10:30 a.m. daily.⁶

12. In approximately June 2016, a confidential human source (“CHS-1”), who was then an inmate of FCI Ft. Dix serving a term of imprisonment for a CP offense, provided information to the FBI regarding a network of individuals also serving terms of imprisonment at FCI Ft. Dix for prior CP offenses. According to CHS-1, the members of this network, who were inmates in housing units in FCI Ft. Dix’s Eastern Compound, were accessing, receiving, possessing, and distributing images and videos of CP from within FCI Ft. Dix. CHS-1 explained that the individuals engaged in this conduct with the use of illegally possessed cellphones from within FCI Ft. Dix, which they used to access the internet.

13. The cellphones are available for rent from the owners of those cellphones. According to CHS-1, **Jeffries** himself bought a cellphone for between \$900 and \$1,000. The cellphones are also available for rent at varying prices, depending on the housing unit, at a cost of approximately \$4-10 per hour. The individuals would download images and videos of CP that they would store on a “cloud” account⁷ and gained access to the cloud account using a shared username and password in order to disguise their identities. Furthermore, images and videos on the cloud account could be downloaded and stored for further distribution onto micro SD cards – *i.e.*, physically small digital storage devices that can be inserted into “smart phones,” and are capable of storing hundreds of images and videos.

⁶ Although the information provided by W-1 is generally consistent with the findings of this investigation, as set forth in greater detail below – particularly with respect to **Jeffries**’ role and participation in the FCI Ft. Dix CP Network – W-1’s account has not been independently verified.

⁷ A cloud account is an account with a storage company that utilizes computer servers to enable users to store and access digital files on the computer servers. In other words, cloud storage is a mechanism by which files can be saved to an off-site storage system maintained by a third-party, and the files are saved to a remote server instead of the user’s own computer/device hard drive. The Internet provides the connection between the user’s computer/device and the remote server for saving and retrieving the files.

14. Investigators have determined that the following inmates, among others, are members of the FCI Ft. Dix CP Network:

a. **Anthony Craig Jeffries**

- i. CHS-1 identified **Jeffries** as the ringleader of the FCI Ft. Dix CP network. **Jeffries** pleaded guilty in the Western District of Virginia, on or about March 28, 2011, to three counts of distribution of CP in violation of 18 U.S.C. §§ 2252A(a)(1) and 2252A(b)(1), and one count of possession of CP in violation of 18 U.S.C. §§ 2252A(a)(5)(b) and 2252A(b)(2).⁸ The court sentenced **Jeffries** to 168 months' imprisonment, with a lifetime period of supervised release to follow his release from custody, and recommended to the BOP that **Jeffries** be incarcerated in Morgantown, West Virginia, "if such incarceration is consistent with sex offender treatment."⁹ According to the BOP, **Jeffries**, who is 32 years old, has a scheduled release date of August 13, 2022.¹⁰
- ii. CHS-1 recorded **Jeffries'** transfer, to CHS-1, of a micro SD card containing CP on November 1, 2016. Cooperating Defendant 1 ("CD-1"), who is discussed further in this Affidavit, recorded **Jeffries** discussing the contents of another SD card which contained child pornography on or about April 19, 2017.

b. **Brian J. McKay**

- i. **McKay** pleaded guilty in the Eastern District of Pennsylvania, on or about December 11, 2008, to one count of distribution of child pornography in violation of 18 U.S.C. § 2252(a)(2), and one count of possession of child pornography in violation of 18 U.S.C. § 2252(a)(4)(B).¹¹ The court sentenced **McKay** to 180 months' imprisonment, with a twenty-year period of supervised release to follow his release from custody, and recommended to the BOP that **McKay** "be placed at Federal Medical Center Devens in order to participate in appropriate sex offenders therapy."¹² According to

⁸ See *United States v. Anthony C. Jeffries*, 11-cr-00012-NKM (W.D. Va.), Dkt. No. 8 (plea agreement).

⁹ See *id.* at Dkt. No. 47.

¹⁰ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

¹¹ See *United States v. Brian McKay*, 08-596-PBT (E.D. Pa.), Dkt. No. 17 (plea hearing).

¹² See *id.* at Dkt. No. 26.

the BOP, **McKay**, who is 46 years old, has a scheduled release date of June 28, 2021.¹³

- ii. CHS-1 recorded **McKay**'s transfer, to CHS-1, of a micro SD card containing CP on both November 1, 2016 and February 15, 2017. On the first occasion, **McKay** transferred the micro SD card to CHS-1 on behalf of **Roffler**, in anticipation of payment to **Roffler**. On the second occasion, **McKay** transferred the micro SD card to CHS-1 on behalf of **Jordan T. Allen**, in anticipation of payment to **Allen**.

c. **Jordan T. Allen**

- i. **Allen** pleaded guilty in the Southern District of Ohio, on or about October 5, 2011, to one count of receipt of child pornography in violation of 18 U.S.C. § 2252(a)(2).¹⁴ The court sentenced **Allen** to 102 months' imprisonment, with a ten-year period of supervised release to follow his release from custody.¹⁵ According to the BOP, **Allen**, who is 31 years old, has a scheduled release date of December 30, 2018.¹⁶
- ii. CHS-1 recorded his partial payment to **Allen**, on February 15, 2017, for the micro SD card that **McKay** had earlier transferred to CHS-1.

d. **Christopher D. Roffler**

- i. **Roffler** pleaded guilty in the Eastern District of Virginia, on or about July 12, 2010, to one count of transportation of CP in violation of 18 U.S.C. § 2252(a)(1).¹⁷ The court sentenced **Roffler** to 100 months' imprisonment, with a ten-year period of supervised release to follow his release from custody, and "recommend[ed] that the defendant participate in a BOP sex

¹³ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

¹⁴ See *United States v. Jordan T. Allen*, 11-cr-00197-MHW (S.D. Ohio), Dkt. No. 6 (plea hearing).

¹⁵ See *id.* at Dkt. No. 39.

¹⁶ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

¹⁷ See *United States v. Christopher D. Roffler*, 10-cr-85-RAJ (E.D. Va.), Dkt. No. 6 (plea agreement).

offender treatment program.”¹⁸ According to the BOP, **Roffler**, who is 30 years old, has a scheduled release date of August 22, 2019.¹⁹

- ii. As noted below, CHS-1 recorded **Roffler**, on November 1, 2016, making arrangements for payment to be made to **Roffler** for the card that **McKay** had earlier transferred to CHS-1.

e. **Erik M. Smith**

- i. **Smith** pleaded guilty in the Western District of Michigan, in or about June 2010, to one count of receipt of child pornography in violation of 18 U.S.C. § 2252(a)(2) and (b)(1).²⁰ The court sentenced **Smith** to 235 months’ imprisonment, with lifetime supervised release to follow his release from custody, and recommended that **Smith** “receive sex offender treatment.”²¹ According to the BOP, **Smith**, who is 36 years old, has a scheduled release date of March 26, 2027.²²
- ii. According to public reports, **Smith** was sentenced to a consecutive 25-year state sentence for charges relating to the homicide of **Smith**’s former boyfriend.
- iii. CHS-1 recorded **Smith**’s sale, to CHS-1, of a micro SD card containing CP on February 15, 2017.

f. **Jacob S. Good** (previously “Inmate-1”)²³

- i. **Good** pleaded guilty in the Eastern District of Virginia, on or about July 9, 2013, to one count of distribution of child pornography in violation of 18

¹⁸ See *id.* at Dkt. No. 21.

¹⁹ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

²⁰ See *United States v. Erik M. Smith*, 10-cr-00006-RAED (W.D. Mich.), Dkt. No. 26 (plea hearing).

²¹ See *id.* at Dkt. No. 39.

²² See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

²³ **Good** was previously identified as Inmate-1 in an Affidavit I presented to the Court on April 21, 2017 in support of an application for issuance of criminal complaints in connection with this investigation. For sake of consistency and clarity, the persons identified in that prior Affidavit as Inmate-2 and Inmate-3 will continue to be identified by those monikers notwithstanding the replacement of Inmate-1 with **Good**’s actual name.

U.S.C. § 2252A(a)(2)(A).²⁴ The court sentenced **Good** to 60 months' imprisonment, with a five-year period of supervised release to follow his release from custody, and recommended to the BOP that **Good** "receive treatment for his psychological and neurological issues, including psychosexual treatment." According to the BOP, **Good**, who is 26 years old, has a scheduled release date of February 6, 2018.²⁵

- ii. As noted below, CHS-1 recorded **Good**, on November 1, 2016, explaining that **Good** had a micro SD card in his possession containing CP which he had accessed and downloaded from the "Dark Web." **Good** also stated his intention to continue to access and view CP even after his release from custody on his current charge. Consistent with **Good**'s recorded statements about accessing CP sites on the "Dark Web," investigators located in **Good**'s locker during a court-authorized search a scrap of paper with two Tor website addresses.²⁶ Upon examination, law enforcement confirmed that one of the sites, which was active at the time, contained a large amount of CP.

g. **William H. Noble**

- i. **Noble** pleaded guilty in the District of Massachusetts, on or about May 24, 2012, to transportation of child pornography and distribution of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(1) and (a)(4)(B).²⁷ The court sentenced **Noble** to 81 months' imprisonment on each count to run concurrently, with a five-year period of supervised release to follow his release from custody. According to the BOP, **Noble**, who is 52 years old, has a scheduled release date of March 8, 2018.²⁸
- ii. As explained below, CD-1 recorded **Noble** on or about April 19, 2017, discussing CP on a SD Card, shared by **Noble** and **Bush**, which **Noble** transferred to CD-1 with an understanding that CD-1 would have a duplicate of the SD Card made and in turn provide one of the SD cards back to **Noble**, while retaining one for CD-1's personal use. **Noble** utilizes the nickname

²⁴ See *United States v. Jacob S. Good*, 13-cr-00101-JAG (E.D. Va.), Dkt. Nos. 8 and 23 (plea and judgment).

²⁵ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

²⁶ See *infra* n. 30 for explanatory information regarding the Tor network.

²⁷ See *United States v. William H. Noble*, 11-cr-10284 (D. Mass.), Dkt. Nos. 27 and 39 (plea hearing and sentencing).

²⁸ See BOP Inmate locator, available at <https://www.bop.gov/inmateloc/>.

“Bill,” as confirmed by a consensual recording with CD-1 and a subsequent recorded, consensual interview with law enforcement.

h. Charles Wesley Bush

- i. **Bush** pleaded guilty in the Eastern District of Tennessee, on or about March 7, 2013, to three counts of distribution of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2) and (b), and possession of materials containing child pornography, in violation of 18 U.S.C. §§ 2252A(5)(b).²⁹ The court sentenced **Bush** to 151 months’ imprisonment on counts one through three, to run concurrently, and 120 months on count four, also to run concurrently, with a five-year period of supervised release to follow his release from custody. According to the BOP, **Bush**, who is 38 years old, has a scheduled release date of May 24, 2024.
- ii. As explained below, CD-1 recorded **Noble** on or about April 19, 2017, discussing CP on a SD Card, shared by **Noble** and **Bush**, which **Noble** transferred to CD-1 with an understanding that CD-1 would have a duplicate of the SD Card made and in turn provide one of the SD cards back to **Noble**, while retaining one for CD-1’s personal use. **Bush** utilizes the nickname “Wes,” as confirmed by a consensual recording with CD-1 and a subsequent recorded, consensual interview with law enforcement.

i. Inmate 2

- i. **Inmate 2** pleaded guilty in the Eastern District of Virginia, on or about January 20, 2010, to two counts of transportation of child pornography in violation of 18 U.S.C. § 2252A(a)(1). The court sentenced **Inmate 2** to 210 months’ imprisonment, and recommended to the BOP that **Inmate 2** “receive mental health and sexual offender counseling.” According to the BOP, **Inmate 2**, who is 28 years old, has a scheduled release date of April 5, 2025.
- ii. CHS-1 recorded **Inmate 2**, on November 1, 2016, informing CHS-1 that **Inmate 2** jointly owned with **Roffler** a micro SD card that CHS-1 was purchasing from **Roffler**.

j. Inmate 3

- i. **Inmate 3** pleaded guilty in the Middle District of Georgia, on or about January 30, 2012, to one count of possession of child pornography in violation of 18 U.S.C. § 2252(a)(4)(B). The court sentenced **Inmate 3** to 78 months’ imprisonment. According to the BOP, **Inmate 3**, who is 34 years old, has a scheduled release date of April 9, 2018.

²⁹ See *United States v. Charles Wesley Bush*, 12-cr-00140 (E.D. Tenn.), Dkt. Nos. 17 and 47 (plea and judgment).

ii. After CHS-1 told **Jeffries** that CHS-1 lost a micro SD card that **Jeffries** had transferred to CHS-1 on November 1, 2016, CHS-1 agreed to make payment to **Jeffries** via the mother of **Inmate 3**. According to CHS-1, **Jeffries** and **Inmate 3** are in a romantic relationship.

15. CHS-1 informed the FBI that **Jeffries** and two other inmates had exchanged images and videos of CP. Specifically, **Jeffries** had provided one of these other inmates with a micro SD card containing CP and **Roffler** had provided a micro SD card containing CP to **Jeffries**. Furthermore, CHS-1 advised that inmates frequently kept the micro SD cards on their person throughout the day and that CHS-1 believed that **Jeffries** hid his cellphone in the Education building of the East Compound of FCI Ft. Dix, specifically in either the library or the hobby shop.

16. CHS-1 also informed the FBI that **Jeffries** had said he could provide CHS-1 with anything CHS-1 wanted in terms of CP. According to CHS-1, **Jeffries** previously rented a cellphone, but eventually purchased a cellphone for approximately \$900 to \$1,000 from another inmate, to which CHS-1 contributed \$50 to \$75.

17. CHS-1 informed the FBI that FCI Ft. Dix inmates utilize three different cloud services to access images and videos of CP, that they use an internet browser known as The Onion Router (or, “TOR”),³⁰ and that about 20 GBs of CP data existed in the cloud. CHS-1 acknowledged that he had previously viewed some of the CP on a phone that CHS-1 rented.

18. CHS-1 advised law enforcement that at one point **Jeffries**’ phone screen broke (but the phone remained operable). Even as **Jeffries** sought to acquire a new phone, however, he continued to rent out his phone with the broken screen at the rate of \$6 per hour. CHS-1 explained that inmates use cellphones in their housing units, and that other inmates serve as lookouts to avoid detection.

³⁰ According to www.torproject.org, “[t]he Tor network is a group of volunteer-operated servers that allows people to improve their privacy and security on the Internet. Tor’s users employ this network by connecting through a series of virtual tunnels rather than making a direct connection, thus allowing both organizations and individuals to share information over public networks without compromising their privacy.” Tor routes a user’s communications across this distributed network of computers, or “nodes.” The last computer through which the communications are routed is known as the “exit node,” and only the Internet Protocol address (or, “IP address”) of the “exit node” is detected by the online service to which the user connects, thereby concealing the origin IP address. This increases an individual’s ability to remain anonymous on the Internet while communicating through the Tor network. In order to access the Tor network, a user must install Tor software.

Tor’s “hidden services” allow individuals to host web sites, web forums and other services without revealing the physical location of the server. Tor’s hidden services are accessed through a 16 character string with “.onion” attached to the end. For example, abcdefghijklmnop.onion. These hidden services can only be accessed if the user is using Tor and operating in the Tor network. This hides both the user’s true IP address and the IP address of the hosted service. Tor network sites are often described in common parlance by users as being part of the “Dark Web.”

19. CHS-1, via a third party, informed law enforcement that phone number xxx-xxx-9231 is the phone number of **Jeffries**' cellphone.

20. In addition, as set forth further below, in February 2017, one of the members of the FCI Ft. Dix CP Network offered to cooperate with law enforcement after having sold an SD Card containing CP to CHS-1. In order to protect the identity of this charged defendant, he is referred to herein, from the time of his cooperation with law enforcement, as Cooperating Defendant 1 ("CD-1").

21. On April 21, 2017 a United States Magistrate Judge in the District of New Jersey issued criminal complaints charging **Jeffries**, **McKay**, **Allen**, **Roffler**, and **Smith** with the following offenses:

Defendant	Date of Charged Conduct	Charged Offense
Jeffries	November 1, 2016	Count 1: Distribution of child pornography
McKay	November 1, 2016	Count 1: Distribution of child pornography Count 2: Conspiracy to distribute child pornography
Roffler	November 1, 2016	Count 1: Conspiracy to distribute child pornography
McKay	February 15, 2017	Count 3: Distribution of child pornography Count 4: Conspiracy to distribute child pornography
Allen	February 15, 2017	Count 1: Conspiracy to distribute child pornography
Smith	February 15, 2017	Count 1: Distribution of child pornography Count 2: Selling, and possessing with intent to sell, child pornography on federal property

See United States v. Anthony Craig Jeffries, (D.N.J) Mag. No. 17-05514-KMW; United States v. Brian J. McKay, (D.N.J) Mag. No. 17-05515-KMW; United States v. Jordan T. Allen, (D.N.J) Mag. No. 17-05516-KMW; United States v. Christopher D. Roffler, (D.N.J) Mag. No. 17-05517-KMW; and; United States v. Erik M. Smith, (D.N.J) Mag. No. 17-05518-KMW.

22. On April 26, 2017, law enforcement arrested **Jeffries**, **McKay**, **Roffler**, **Allen**, and **Smith** pursuant to the above-referenced criminal complaints and arrest warrants.

23. On April 21, 2017 a United States Magistrate Judge in the District of New Jersey also authorized fourteen (14) search warrants for locations and persons inside FCI Ft. Dix, including the rooms and locker spaces assigned to inmates **Good**, **Noble**, **Bush**, and others. Each of these search warrants were executed on April 26, 2017 in connection with the arrest operation for the five inmates initially charged in this case. On that same date, law enforcement conducted numerous interviews of inmates, including **Good**, **Noble**, and **Bush**.

(continued on next page)

24. Based upon the evidence described in sum and substance below, I seek issuance of criminal complaints charging **Good, Noble, and Bush** with the **Subject Offenses**, as reflected in the chart below:

Defendant	Dates of Offense Conduct	Subject Offenses
Good	November 1, 2016 and on other dates in 2016	Count 1: Possession of child pornography on federal property Count 2: Access with intent to view child pornography on federal property
Noble	April 19, 2017	Count 1: Distribution of child pornography Count 2: Conspiracy to distribute child pornography Count 3: Possession of child pornography on federal property
Bush	April 19, 2017	Count 1: Distribution of child pornography Count 2: Conspiracy to distribute child pornography Count 3: Possession of child pornography on federal property

CHS-1's Consensual Sharing With Law Enforcement of Access to FCI Ft. Dix Child Pornography Cloud Accounts

25. On or about August 25, 2016, CHS-1 consented to allow law enforcement to access a number of FCI Ft. Dix CP cloud accounts and a Google Gmail account. CHS-1 advised law enforcement that these were shared accounts to which multiple inmates had access. CHS-1 also provided one or more possible usernames and passwords to access accounts.

26. On or about August 29, 2016, law enforcement accessed one of the accounts using a username and password that CHS-1 had provided. Review of the contents of the account by an experienced FBI Special Agent who has specialized in the investigation of CP cases confirmed the presence of CP images and child erotica. Multiple images appeared to depict prepubescent children, including infants and toddlers. In addition, a folder, as well as numerous video files, contained titles indicative of CP or child erotica. The reviewer documented the review of the account content with the use of video capture and screenshots, which were preserved as evidence.

CHS-1'S FIRST CONSENSUALLY RECORDED ACQUISITION OF CP FROM FCI FT. DIX INMATES (NOVEMBER 1, 2016)

Part 1

(Acquisition of Card 1 from McKay and Agreement to Make Payment to Roffler)

27. On or about November 1, 2016, CHS-1 conducted a consensually recorded acquisition of a 16 GB micro SD card ("Card 1") from McKay, for which payment was later made to Roffler. As noted below, subsequent review of the content of **Card 1** confirmed that it contained CP.

28. Prior to the transaction, law enforcement inspected CHS-1 in an effort to confirm that CHS-1 did not possess any devices or micro SD cards. The search did not reveal any such items. Following the transaction, law enforcement again searched CHS-1 and recovered **Card 1** from CHS-1's front pants pocket.

29. Prior to the transaction with **McKay** and **Roffler** to acquire **Card 1**, CHS-1 engaged in conversation with **Good** regarding the content of a micro SD card located in **Good's** room:

CHS-1: Is it, is it full? Is the card, what 16 gig?
JG: No. No. Yeah. Yeah, no.
CHS-1: It's not full?
JG: It's not even close
CHS-1: What's on it exactly?
JG: I remember [UI]³¹
CHS-1: Like just videos?
JG: Yea I had [UI] on it, but then all of it, I don't know how, it all just disappeared. [UI] I think uhm, I have no clue how it just all disappeared on me one day so I was like whatever [UI]
CHS-1: What do you mean it got deleted?
JG: Yea!
CHS-1: So then how'd you get it back on?
JG: I've been slowly but surely been getting it back. [UI]
CHS-1: From where, the cloud?
JG: No, from, from some sites on the dark web.
CHS-1: Oh alright I didn't know you knew how to do that.
JG: Yea I know how to do that!
CHS-1: What just boy stuff? Or what?
JG: Yea boy stuff, but umm, yeah, the only thing I don't have, the only thing I don't know, the only thing I don't have is, ya know, a cloud [UI] cause that's what I wanted to do was eventually, you know, get rid of the card completely and, you know, get it on the cloud, you know, on the dark web, cause that's probably better on there than it is having it actually in my possession, ya know?

30. Following this exchange, **Good** confided in CHS-1 that **Good** had no intention of stopping his consumption of CP even after his release from custody which, at that time, **Good** believed would be in 2018:

JG: Like I said, I don't even know how much I've got on there, um I have to look at it, and then I wouldn't have any problem loading it up. As long as I can put stuff on the cloud and access that forever later I don't, I don't mind giving you the card like I can buy a card, that's the only thing I, ya know, I'm just gonna be honest but [interrupted by person passing by], like, I'll be honest I have no intention of stopping.
CHS-1: Huh?
JG: I'll be honest I have no intention of stopping.
CHS-1: [Laughter]

³¹ "UI" represents "unintelligible."

JG: I'll be perfectly 100 percent honest, I have zero intention of stopping so that's why I'm gonna make sure that even if I give you the card I'll still (UI), like I said I'm gonna upload it all to a cloud or something like that.

CHS-1: Why so you can access it when you get out?

JG: When I get out or when I'm in here, you know, (UI) what I'm probably gonna do is, like I still got about, I got, I got a little bit, I got a little bit less than a year and a half left to go, I go home in 2018. The idea is to grab as much as I can, upload it to the cloud (UI), a cloud that, you know, will stay there for a while, I don't have to access it every thirty days (UI), umm, and then when, ya know, you know, I'll be able to access it, (UI) probation have it already like all there.

CHS-1: Alright.

JG: And that's, and that's how from there on I would probably do it, is through the dark web and all that shit.

CHS-1: Yeah.

JG: Use like almost like a burner phone. These are burner phones basically, they could never ever, ever

CHS-1: Anonymous.

JG: They could never bring, or tag anything back to you. That's the one reason why I like, I like using it here, they can't bring it back, they can't put it, they can't bring it back to you unless they literally catch you red handed, (UI) there's a (UI) guy in the (UI) he got caught with a phone right, and (UI) had child porn on it,

CHS-1: Oh yea?

JG: Yeah, but he still came back, he didn't get charged with it.

- a. Later on during the conversation, **Good** explained that he was willing to transfer his SD Card to CHS-1 if he could upload its contents to a Cloud account. **Good** also contemplated taking the SD card home with him upon release, and reiterated his intentions to never stop viewing CP:

JG: Right, and I, I've got no problem loading it up and then selling it to you. I just want to make sure I can move, I gotta move my (UI) to the cloud somewhere. Because like I, like I said, I have no intention of stopping. I mean, that's clearly obvious but when I go back home, then I want, you know I almost (UI) I was actually gonna take (UI) the SD card with me. So.

CHS-1: Yeah.

JG: Maybe we'll see. (UI)

CHS-1: How do you walk out with an SD card?

JG: [grunt]

CHS-1: [laughing]

JG: Up your fucking asshole, just like everything else in the world. Up your fucking asshole. I don't know how, you know difficult it is when you leave, and how much they search you when you leave. You know?

CHS-1: I don't think they, I don't think they're that thorough.

31. On April 26, 2017, law enforcement executed the above-referenced search warrants. During a search of **Good's** locker, law enforcement located and seized a scrap of paper with two addresses for TOR "Dark Web" sites. On May 4, 2017, law enforcement entered the addresses into The Onion Router Tor browser in order to determine whether the websites were accessible and what type of content was hosted at each site. One of the sites was no longer accessible. The other site, however, featured content categorized sub-forums containing numerous images and videos of CP, including but not limited to images and videos featuring boys, ranging from infants and toddlers to teenagers, engaged in sexual acts.

32. During the recording, CHS-1 arranged to get a second micro SD card ("Card 2") from **Jeffries** after the inmate count between 4:00 p.m. and 5:00 p.m.³² This second meeting was also recorded, and the nature of the second transaction is discussed below. *See Part 2, infra.*

33. During the first recorded transaction, CHS-1 interacted with **Jeffries** and **McKay**, among others. Relevant discussions included the following:

- a. **Jeffries** explained that CHS-1 could locate "the latest stuff" on particular cloud services or accounts, but that "the newest stuff is on the card":

CHS-1: What cloud do I have to go to, to find the latest stuff? Tonight.

AJ: Either [Cloud 1] or, uhm [Cloud 1] has some, and the [Cloud 2] has some.

CHS-1: What you just upload to both or just, which one?

AJ: You can upload to either one, I mean (UI) [Cloud 1] isn't as fast as [Cloud 2], but [Cloud 2] has less space.

CHS-1: Alright.

AJ: So. Uhm.

CHS-1: So the newest stuff where, I mean just both of them?

AJ: The newest stuff is on the card.

- b. **McKay** described the content of a particular file on **Card 1** in detail. Specifically, **McKay** referred to "[o]ne of the pictures . . . towards the bottom of the list," and recommended that CHS-1 "watch that one." **McKay** said, furthermore, that the content included a red-headed 11-year-old boy with a blurry face wearing a red shirt with white marks, like polka dots. Law enforcement reviewed the content of the disc and located a video file within a folder titled "Boys," depicting a prepubescent, Caucasian male, with red hair, approximately 10-11 years old, wearing a red shirt with numerous white circles on the front, engaged in a sexually

³² According to the FCI Ft. Dix Admission and Orientation Inmate Handbook, "counts" occur several times daily and overnight. During daytime counts inmates are required to be present near their assigned bunks. During night counts inmates must be visible to staff. *See* Ft. Dix Inmate Handbook at 4 (April 2016), *available at* https://www.bop.gov/locations/institutions/ftd/FTD_aohandbook.pdf (last visited January 31, 2018).

explicit act.

34. As noted above, after acquiring **Card 1** from **McKay**, CHS-1 later met with **Roffler** and engaged in the following exchange with **Roffler** regarding **Card 1**, in which **Roffler** acknowledged that **McKay** had told **Roffler** about giving **Card 1** to CHS-1, and **Roffler** agreed to accept payment of \$80 in exchange for **Card 1**:

CHS-1: Roffler, hey, did you get the message?
CR: What message?
CHS-1: From [Inmate 2]?
CR: Come see you?
CHS-1: Yeah, yeah.
CR: I'm here.
CHS-1: Alright. [laughs] Oh, I just wanted to (UI) is there any place I can send a check?
CR: Um,
CHS-1: ... (UI) family or anything?
CR: (UI).
CHS-1: That's it? You don't have any family, I can just take a personal check?
CR: Not really.
CHS-1: Alright. Alright, can you give me your name and number again?
CR: Sure.
CHS-1: Alright, you got, you got paper? Here... Brian gave me the card today.
CR: Okay, yeah he told me about it, yeah.
CHS-1: It's eighty, right? Eighty dollars.
CR: Yeah.
CHS-1: Alright. Now what, what videos on there do you not want (UI).
CR: Huh?
CHS-1: (UI) deleted? What movies on there you don't want deleted?
CR: Um, whatever you think is (UI)?
CHS-1: huh?
CR: Whatever you think's not worth it (UI).
CHS-1: Alright.
CR: (UI) on the cloud. I gotta find someone to do that.
CHS-1: Alright.

35. CHS-1 informed law enforcement after the transaction that **Card 1** belonged to **Roffler** and **Inmate 2**, but that CHS-1 obtained **Card 1** from **McKay**, who had borrowed it from **Roffler**. CHS-1 also reported to law enforcement that in exchange for CHS-1's purchase of **Card 1**, CHS-1 agreed to pay **Roffler** \$80, with payment to be made to **Roffler**'s inmate account ("books"). CHS-1 informed **Roffler** that CHS-1 would have a friend mail the payment, and that the friend would use a made up name to avoid any subsequent connection to CHS-1. Consistent with CHS-1's understanding with **Roffler**, following CHS-1's receipt of the micro SD card, law enforcement made a payment of \$80 to **Roffler**'s inmate account using information for **Roffler**

that CHS-1 provided. CHS-1 informed law enforcement that **Roffler** subsequently confirmed to CHS-1 that **Roffler** received the payment.³³

36. Following the transaction, law enforcement forensically examined the content of **Card 1** and determined that there were hundreds of CP videos on **Card 1**, including CP videos involving prepubescent children and CP with bestiality.

Part 2
(Acquisition of Card 2 from Jeffries)

37. On or about November 1, 2016, CHS-1 conducted a second consensually recorded purchase of a 16 GB micro SD card (“**Card 2**”) subsequently confirmed to contain CP, as noted below. CHS-1 obtained **Card 2** from **Jeffries**. Relevant discussions between CHS-1 and **Jeffries** included the following topics and excerpted conversations:

- a. **Jeffries** showed his familiarity with the content of **Card 2** from his description of certain non-CP movies directed by a particular director. When CHS-1 later acquired **Card 2** from **Jeffries**, CHS-1 asked about the movies on **Card 2**, and the name of the “series.” **Jeffries** responded “*Halloween*.” Consistent with **Jeffries**’ description, a series of movies directed by the movie director **Jeffries** had previously named, including one movie titled “*Halloween*,” were located on **Card 2**.
- b. In addition, **Jeffries** described a CP video depicting a man and a boy later found on **Card 2**:

CHS-1: The video, Brian was telling me about a video with two men and a boy...
AJ: Uh, yeah, a Colombian, or no, uh, little British boy, it's alright, at the end they cum all over him.
CHS-1: Yeah, in the mouth and...
AJ: Yeah...
CHS-1: One in the (UI)
AJ: ... in the mouth and he pulls it out of his butt and cums on his little wiener, it's all hard and shit.
CHS-1: What uh, is that on the cloud or on a card?
AJ: Yeah it's on there, uh,
CHS-1: It's on the card?
AJ: Fuck, I don't know.
CHS-1: Alright.
AJ: There's too much.

³³ **Roffler**’s inmate account does in fact reflect a credit to the account in an amount of \$80 on November 8, 2016.

Subsequent review of the contents of **Card 2** confirmed the presence of a video that included “English Boy” in the file title with content consistent with **Jeffries’** description. The video depicted a Caucasian adult male’s penis penetrating the anus of a prepubescent boy while a second adult male’s penis is inserted in the prepubescent boy’s mouth. During the recording one of the unknown males removes his penis from the anus of the prepubescent boy and places his penis on the prepubescent boy’s genitals. Consistent with **Jeffries’** description, the unknown male ejaculates on the prepubescent boy’s penis and abdominal area.

c. **Jeffries** also confirmed his knowledge of the content of the cloud:

CHS-1: How, how big of a card do you need now, to fit everything that’s on the cloud?
AJ: Huh?
CHS-1: How big of a card would you need to fit everything that’s on the cloud on the card?
AJ: A hundred and twenty gigs.
CHS-1: You serious? Not feature films, I’m talking about...
AJ: To fit everything that’s on the cloud...
CHS-1: ...I’m talking about CP...
AJ: ...a hundred and twenty gigs..
CHS-1: [laughs]
AJ: ...a hundred and twenty fucking gigs.

38. After returning from the second transaction, law enforcement again searched CHS-1 and recovered **Card 2** from the front pants pocket of CHS-1. CHS-1 explained that he obtained **Card 2** from **Jeffries**. **Jeffries** stated that he did not want to sell **Card 2** to CHS-1, but had agreed to let CHS-1 borrow it.

39. Following the transaction, law enforcement forensically examined the content of **Card 2** and determined that there were dozens of CP videos on **Card 2**. These included CP videos involving prepubescent children, including infants and toddlers, one CP video involving bestiality, one CP video involving a blindfolded child, and one CP video involving sadomasochism.

40. Law enforcement forwarded the contents of **Card 1** and **Card 2** to the National Center for Missing and Exploited Children (“NCMEC”) for examination as part of NCMEC’s Child Recognition & Identification System (“CRIS”) in order to determine whether law enforcement previously identified any of the child victims depicted on **Card 1** and **Card 2** in other investigations.

41. In a report dated January 30, 2017, NCMEC confirmed that law enforcement had in fact identified certain children depicted in images and videos on **Card 1** and/or **Card 2**, and identified 16 recognized series of CP from those images and/or videos. The NCMEC report provided law enforcement contacts for purposes of verifying the ages and identification of depicted child victims. The contact information for these law enforcement contacts includes agencies around the world, including Canada, Germany, Spain, and Switzerland, as well as numerous jurisdictions around the United States.

42. Subsequent to CHS-1's purchase of **Card 2**, **Jeffries** asked for the card's return. **Jeffries** expressed frustration when CHS-1 said that he had lost **Card 2** and CHS-1 agreed to pay **Jeffries** back \$60 to \$70 for the loss of **Card 2**. CHS-1 informed law enforcement that **Jeffries** would provide CHS-1 with the address of **Inmate 3**'s mother so that CHS-1 could make the payment. As noted below, payment was forwarded to **Inmate 3**'s mother, consistent with CHS-1's arrangement with **Jeffries**.

Mailing of Payment for Card 2 to Inmate 3's Mother

43. On or about November 7, 2016, CHS-1 confirmed that payment was to be made to the mother of **Inmate 3**, for the loss of **Card 2**, using the mailing address that **Jeffries** had provided CHS-1. **Jeffries** also provided a telephone number for **Inmate 3**'s mother and an email address. CHS-1 shared this contact information with law enforcement.

44. The phone number that CHS-1 provided for **Inmate 3**'s mother is xxx-xxx-0398. The cellphone assigned this number is referred to herein as **Target Phone 2**.

45. Law enforcement mailed payment to **Inmate 3**'s mother using the contact information that CHS-1 received from **Jeffries** and provided to law enforcement. CHS-1 advised law enforcement that, upon receipt of the payment, **Inmate 3**'s mother would forward payment to the prison account of **Jeffries** or **Inmate 3**.

The Interview of CD-1 and Subsequent Cooperation

46. During the course of the investigation, after CHS-1 had obtained contraband from one of the five charged defendants referenced *supra* page 11, paragraphs 21-22, that defendant, referred to herein as **CD-1** – offered his cooperation to law enforcement.

47. On or about March 8, 2017, law enforcement interviewed **CD-1**, after **CD-1** had voluntarily contacted the FCI Ft. Dix Special Investigative Unit on or about February 23, 2017 regarding the FCI Ft. Dix Child Pornography Network. **CD-1** acknowledged having used a phone to access and view CP in the cloud account that **Jeffries** had established. **CD-1** informed investigators that he had been introduced to **Jeffries** by **Bush**. **CD-1** further explained that he used a phone to download a cloud application and then was able to view CP images and videos. **CD-1** also stated that **Jeffries** and **Bush** had told **CD-1** that micro SD cards were available and were better for viewing CP because they would play in regular speed and would not be delayed by buffering or loading.

48. **CD-1** was able to provide the address of the cloud account used to store CP, as well as the username and password to access the account. **CD-1** advised that **Jeffries** provided **CD-1** with this information.³⁴ **CD-1** was also able to explain that one of the cloud accounts contained CP organized in folders – one folder for boy videos, a second folder for girl videos, and a third

³⁴ The username and password that **CD-1** provided matched a username and password that CHS-1 previously provided to law enforcement, which law enforcement used in order to access the cloud accounts and Gmail account described above.

folder for boy and girl videos.³⁵ According to CD-1, a separate cloud account has content only involving men and boys.³⁶

49. CD-1 stated that **Bush** also introduced him to CHS-1, and that CD-1 learned that CHS-1 had a blank micro SD card. CD-1 stated that he loaded the blank micro SD card for CHS-1 in exchange for payment in stamps. Although CD-1 expected to continue to have access to the micro SD card from CHS-1, and therefore to be able to view the content of the micro SD card when CD-1 had rented a phone, CHS-1 told CD-1 that CHS-1 had sold the card to another inmate. CD-1 was aware of the content of this micro SD card, which he described as containing images and videos of children between the ages of 3 and 14 years old.³⁷

50. CD-1 further stated that **Jeffries** was very good with a cell phone, and that **Jeffries** could always get it to work when CD-1 needed help viewing CP from a cellphone. CD-1 stated that he would watch as **Jeffries** would download CP, select images and videos of boys or girls, and load it to a micro SD card.

51. CD-1 stated that after CD-1 sold a micro SD card to CHS-1, CD-1, **Bush**, and **Jeffries** bought their own micro SD card from another inmate ("W-2") for \$50. CD-1 described W-2 as an older white male, bald, with a foreign accent.³⁸ CD-1 stated that the card was a 16 GB micro SD card and that he paid W-2 for the card.

52. CD-1 explained that he had rented a cellphone for \$10 an hour from someone in the room next door to W-2, but that after he met **Jeffries**, **Jeffries** took the cellphone and the micro SD card and left. **Jeffries** later returned later and told CD-1 that there was CP on the card and that **Jeffries** had only used one tenth of the space on the micro SD card.

53. CD-1 stated that the next day **Bush** rented a phone, and CD-1 and **Bush** downloaded CP videos to the SD card and then viewed the CP videos. CD-1 stated that **Bush** retained possession of the SD card even though CD-1 purchased the card and CD-1, **Bush**, and **Jeffries** all have access to it.

54. CD-1 explained that CD-1 recently became upset with **Bush** because **Bush** recently had allowed another inmate ("W-3") to use the SD card. **Bush** also permitted another inmate named "Bill" – who CD-1 described as a heavy set, white male with a beard, who lived in a two

³⁵ Although the content that law enforcement previously viewed was different from this description, it is of course possible that the contents and folder structure in the account changed over time, or that law enforcement was not able to view the particular account CD-1 referenced.

³⁶ See *id.*

³⁷ Subsequent review of the content of the seized micro SD card confirmed images of children in this approximate age range. However, CD-1's statement regarding the presence of videos was incorrect; there were only images on the micro SD card.

³⁸ CD-1 positively identified W-2 from photographs that law enforcement provided.

man room on the third floor of a specified unit – use the SD card. CD-1 stated that **Jeffries** helped “Bill” and W-3 load more videos onto the card. CD-1 further explained that he became angry with **Bush** because **Bush** gave the card to W-3 for free and CD-1 had become concerned about too many people knowing about the SD card. Investigators showed a known photograph of **Noble** to CD-1. CD-1 indicated to investigators that the person depicted within the known photograph was the male who CD-1 knew as “Bill.”

55. CD-1 advised that many inmates on the compound view CP, but that he did not know everyone by name. CD-1 also stated that each housing unit has one corrections officer, and that there are lookouts in every stairwell who are able to notify the unit when an officer leaves his or her office within the housing unit. According to CD-1, in addition to viewing CP and using cellphones, inmates at FCI Ft. Dix are getting tattoos, cooking alcohol, and doing drugs. CD-1 stated that inmates hide cellphones in light fixtures, jacket liners, closets, and under lockers.

56. CD-1 offered cooperation to investigators in hope of being designated to a different facility. CD-1 maintained contact with investigators thereafter and provided information to investigators on multiple different occasions regarding the presence of CP in the facility. CD-1 also stated to investigators that CD-1 was willing to covertly and consensually record conversations by other inmates, including **Jeffries**, **Bush**, and **Noble**, regarding CP.

57. On or about March 23, 2017, CD-1 stated to investigators that “Bill” had obtained his own SD card, which contained CP, and which he had access to in addition to the SD card “Bill” shared with **Bush**, **Jeffries**, and W-3.

58. On or about April 11, 2017, CD-1 informed investigators that **Noble** was interested in purchasing the SD card containing CP, which he shared with **Bush**, **Jeffries**, and W-3, so that **Noble** could mail it home so it would be available to him upon release. CD-1 further stated that the SD card contained approximately 1,000 pictures and up to 50 videos. CD-1 explained that **Bush** did not want **Noble** to purchase the card, in part, because **Bush** expected to share and use the card. CD-1 also informed investigators that **Bush** had been hiding an SD card inside a green bible located in **Bush**’s room. According to CD-1, **Bush** had cut out a tiny square of space within the pages of the Bible to create a void where **Bush** could hide the SD card.

59. CD-1 later stated to investigators that CD-1 was in a position to obtain an SD card containing CP from **Bush** and **Noble**.

(continued on the following page)

**CD-1'S CONSENSUALLY RECORDED ACQUISITION OF CP
FROM FCI FT. DIX INMATES
(APRIL 19, 2017)³⁹**

Acquisition of Card 5 from Noble and Bush

60. On or about April 19, 2017, CD-1 conducted a consensually recorded acquisition of a 16 GB micro SanDisk SD card ("Card 5") from **Noble**, which **Noble**, **Bush**, and a third inmate shared, under the guise that CD-1 intended to have the contents of the SD card copied to another SD card and one of the SD cards returned to them for their use. As detailed below, subsequent review of the content of **Card 5** confirmed that it contained CP.

61. Prior to the transaction, law enforcement inspected CD-1 in an effort to confirm that CD-1 did not possess any devices or micro SD cards. The search did not reveal any such items. Following the transaction, law enforcement again searched CD-1 and recovered **Card 5** from CD-1.

62. Discussions between CD-1 **Noble**, **Bush**, and **Jeffries** included the following topics and excerpted conversations:

- a. **Noble** and **Bush** agreed to provide Card 5 to CD-1, and thereafter **Noble** transferred the card to CD-1. **Noble** also indicated that another inmate with whom they shared the card was also in agreement with **Noble** transferring the card to CD-1.

CD-1: ...on the card thing...
WN: Awesome.
CD-1: [clears throat]...so uh, just like yesterday, we'll talk turkey one more time just to make sure that we are on the same page...
WN: ...same pages, yeah...well I talked to my Partner-in-Crime, so he knew what I was up to.
CD-1: Um, Jason?
WN: ...yeah, so that he knew what was going on, and he's like, "that's doable."
UM: They're calling you (UI)...
CD-1: Okay.
UM: (UI) Akbar.
WN: ... so we're good on that, because what he'll do, is he'll help support me on getting that, those funds filtered to you quicker.
CD-1: Okay.

³⁹ On February 15, 2017, investigators conducted a second consensually recorded operation involving CHS-1, during which CHS-1 acquired two more SD Cards (referred to therein as "Card 3" and "Card 4") containing child pornography from inmates **Allen**, **McKay**, and **Smith**. This operation is described in detail in my Affidavit submitted to the Court in support of criminal complaints sought in connection with this investigation. *See, e.g., United States v. Anthony C. Jeffries*, 17-mj-05514-KMW (D. N.J.), Dkt. No. 1 (complaint). For sake of consistency, the fifth card obtained during this investigation is referred to in sequence as "Card 5."

WN: So that will work out very well. See if Partner-in-Crime's involved it's a better thing than having him uninvolved.
CD-1: Yeah.
WN: Plus that way he can get his dirty slit things.
CD-1: His dirty slit things.
WN: Yeah, 'cause he's planning on getting something for himself at some point, so that he can have his dirty slit collection.

b. Bush, who was present with Noble during the conversation with CD-1, discussed how he wanted to be compensated for the transfer of **Card 5** and to utilize some of the money for tattoo work that he wanted **Noble** to perform for him:

WN: ...and what I would have you do, is when you're getting ready for the, if I haven't taken care of him, just filter what you were gonna give to me straight to him instead. And then, he's got art work he's paying for it at some point, that I have to do, still.
CB: And that's (UI).
CD-1: Well that's between you guys.
WN: Yes.
CD-1: I mean...
WN: Well I'm just saying like, if it's coming to me just, if you know that I still owe him, just – to him. Because...
CB: Well do you want me to take that off of it right now?
WN: (UI) that?
CD-1: No.
WN: (UI) already have the game on that?
CB: I can be.
WN: I mean, because I, you know.
CB: Well what I'm saying is, instead of me paying you...
CD-1: [coughs]
WN: Yeah –
CB: ...you're saying pay him...
WN: ...exactly.
CB: So...
WN: That way he'll get it quicker. Because it's money I'm not seeing [short pause], well he's in-house, you know? So it's like, "oh here."
CD-1: We're all in-house!

c. Noble also confirmed that he had downloaded CP to **Card 5**, and that he had worked with Jeffries to organize the contents of it, including by creating a file he referred to as the "BN file," which corresponds to his initials when using his nickname "Bill":

CD-1: What were you working on the last time you had the card? Were, were you working on videos or were you still working on pictures?
WN: Pictures. That's what I mainly focus on.
CD-1: And did you succeed?

WN: The last time I worked on it, yes, yes. I succeeded. That's why there's sub-folder on sub-folder on sub-folder on sub-folder...

CD-1: Which is incredibly annoying.

WN: I know, and I wanted Anthony to help me figure out how to get that all, and he's like, "but we don't have time right now," and I'm like, "so I'm gonna see if I can't work on that." Now that I know that, you know [loudspeaker] ...okay, um now that I know that I can start, because this, there's a lot of shit on the card. Like this crap on my card, do you, do you understand what I'm – have you ever looked at like, you look at the storage itself? Don't look at it with the gallery. The gallery will fuck your brain up. What you wanna do is whenever you go, is go through the storage. You're better off, looking – to look through the SD card. Um.

CD-1: Why?

WN: Because that's how it's, that's how I organize shit.

CD-1: Oh.

WN: See, Anthony originally started organizing it and he put everything into the BN file.

CD-1: Uhuhm.

WN: Which I had created. It was like, okay this is how you do this . . . this was the beginning of it all.

CD-1: You created the BN file?

WN: I created the BN file.

d. Noble also demonstrated that he knew **Card 5** contained CP, including videos of persons sexually abusing toddlers. For example, Noble described one particular video that investigators believe they located during a subsequent examination of **Card 5** based on close similarities to Noble's description:

CD-1: And what were you putting in there? Everything?

WN: Everything. So, it was like, okay, we'll put this and we'll put this and we'll put this and we'll put this and my first couple of experiments and then, then I kinda went – crazy.

CD-1: Yep.

WN: And kinda downloaded a shit load of stuff [laughing] and stuck it on there. And went, "wow, even I haven't seen it all yet."

CD-1: Which one, which ones of the videos were you downloading?

WN: Anthony has downloaded most of the video.

CD-1: Okay.

WN: He's downloaded most of those. Like (UI) you must of seen the three-year-old getting blown by the dude. The guy's like got, got 'em like this, he's moving, [laughs], he's not moving, the kid's moving. [laughing]

CD-1: So he's like doing curls with the, with that poor child.

WN: Yeah, yeah, yes.

CD-1: I haven't seen it actually.

WN: ...this is not, this is not a poor child, this child is enjoying himself (UI)...

CD-1: [laughing]

WN: ...because at the end of it, and I don't think he's, he's not as young as they're proclaiming. I think he's probably four, or he's very talented...

CD-1: Oh because there's a huge difference between three and four!

CB: There is a huge difference in that. Yeah.

WN: There is.

CD-1: [laughs]

WN: ...it's a whole inch...

CD-1: Oh is that what it is!

WN: [laughing]...but um. I think, I think he's a little bit older because he's very, he becomes vocal. But, I didn't hear if he's American or not. He looks like he's uncircumcised though. Because of the angle, you see it from, the angle, the shot is from the top of his head. This way. The guy's down here. And then...

CD-1: Like somebody else is holding the camera?

WN: ...no, it's stationary.

As noted above, subsequent examination of the contents of **Card 5** confirmed the presence of a video matching the description provided by Noble. The video depicted a Caucasian boy, approximately three- to four-years-old, who was naked from the waist down, with an uncircumcised penis. An adult male entered view of the video camera and began to perform oral sex on the child. At one point, the adult male smiled into the camera and gestured with thumbs-up. He then placed his hands behind the child's buttocks and resumed performing oral sex on the child while repeatedly lifting and lowering the boy using his arms and hands in order to facilitate the sexual act. The video, which was approximately seventeen minutes in length, was filmed from a video camera which remained in a stationary position throughout the duration of the recording. In addition, the camera angle provided a view looking downward toward the top of the child's head.

e. Bush confirmed that he too had viewed CP images and videos, including several which he indicated were stored on **Card 5**, including three specific videos which are series known to law enforcement, and which investigators subsequently determined were contained on **Card 5**:

CB: Tell him when he's on there, looking for the girls stuff try to look up Tara or Jenny.

WN: Tara or Jenny?

CB: Umhum.

CD-1: They're girl's names.

CB: They are girl's names. Tara started when she was eight and daddy got her pregnant.

WN: [laughing]...oh geez...

CD-1: Oh my God.
CB: ...eleven or twelve...
WN: Oops.
CB: ...supposedly.
UM: Oh that's one of them famous series isn't it?
CB: Yeah.
WN: One of the more famous ones.
UM: And uh, I can't remember the um...
CB: The guy was almost always wearing a clown mask.
UM: Vicky.
CB: Was the Tara series.
WN: Vicky (UI) [laughing]
CB: Vicky was another one.
WN: [laughing] Vicky.
CD-1: I'm glad I didn't have any Vicky on my computer.
WN: That bitch is fucking rich. [laughing]

63. On April 26, 2017, **Bush** waived his *Miranda* rights and consented to an interview with law enforcement. During the interview, **Bush** confirmed that he had downloaded three specific videos, including a video from the "Tara" series, the "Jenny" series, and the "Vicky" series, which he characterized as "well-known" series. **Bush** provided law enforcement detailed descriptions of each of the three videos he stated that he had downloaded onto **Card 5**. Subsequent examination of the contents of **Card 5** confirmed that it contained three videos from series well-known to law enforcement, which closely matched the detailed descriptions provided to law enforcement by **Bush**. During the April 26, 2017 interview, **Bush** also stated that he had kept an SD card containing CP hidden inside a cut-out he had made in the pages of a Bible, consistent with information provided to law enforcement by CD-1 in advance of the April 19, 2017 operation. During execution of a search warrant on April 26, 2017, law enforcement located and seized a green Bible resting on top of **Bush's** locker, which contained a cut-out within matching the approximate shape and size of an SD card.

64. Following the operation, law enforcement forensically examined the contents of **Card 5** and determined that there were a total of approximately 2,471 images containing CP and 95 videos containing CP. Among these were videos and images of prepubescent children, including infants and toddlers, an image involving bestiality, images depicting sadomasochism, and images of children in underwear and diapers.

Conversation with Jeffries about Card 5, Transferring Contents, and Access to Cloud Accounts

65. After speaking with **Noble** and **Bush** during the consensually recorded meeting on or about April 19, 2017, CD-1 met with **Jeffries** and discussed how CD-1 could transfer the contents of **Card 5** to another SD card. **Bush** was also present for some of the conversation.

- a. **Jeffries** provided advice on how CD-1 could transfer the contents of **Card 5** through the use of contraband cellular telephones and Cloud accounts:

CD-1: Nothing special. Um, I was coming to see you specifically, because I got a new, I got a new card.

AJ: Oh yeah?

CD-1: And uh, at some point, I know we're not gonna, um, I don't know where he's at. I know he's right behind me.

AJ: (UI)

CD-1: Um, I have no idea how to transfer – I don't want to transfer, I want to copy.

AJ: Right.

CD-1: Is that do-able?

AJ: (UI) more effort.

CD-1: [sighs]...well...

AJ: Let's just assume that the, what's on the card is more than what the phone will hold by itself so, you have to put a card in, copy to the phone, take the card out, put the new card in, copy to the card, take that card out, put the old card back in, remember which ones you didn't copy, and copy to the phone, take the card out, put the card in, copy them back, take the card out, put the card back in, remember the ones you didn't copy, copy those, move them to the phone, take the card out.

CD-1: What is this?

AJ: ...it's a seat.

CD-1: Okay. Okay, there has to be an easier way. [sighs]... do you have to put something on the phone to get it to the cloud?

AJ: Uhhhh, it's just a cloud app.

CD-1: No, I mean do you have to put like a picture or video on the phone to put it on the cloud? Because I mean that would be an option, right? One of us can make a new cloud account.

AJ: Well yeah...

CD-1: Just throw it on there.

AJ: You can make a cloud account, but, the you just have to like (UI) upload into the cloud is, it's an easier process, but it still takes just as much time.

CD-1: Yeah?

AJ: Yeah.

CD-1: God damn it.

AJ: We're not working, you're not (UI) broadband speed here, so, the videos that are a hundred megabytes are still (UI) a ton.

b. Jeffries and CD-1 also discussed the prospect of CD-1 selling a duplicate SD card, which was part of the understanding on which Noble transferred Card 5 to CD-1.

AJ: Right, well that's what, um...

CD-1: ...I'm not trying to gouge the man because he's...

AJ: Right.

CD-1: ...done a lot of downloading....

[later in conversation after **Bush** had joined CD-1 and **Jeffries**]

CD-1: Nice. [sighs] So Bill is very excited and I'm very excited for him.
CB: I'm excited too.
AJ: He's going to get caught with it (UI) much longer (UI).
CD-1: [laughing]...don't say that...that's horrible...[laughing]
AJ: We were actually just talking about that this morning, like – what is the need to keep it?
CD-1: That's horrible.
AJ: Really like how many times can you think that you've gone back and, other than like your favorite video, watch a video?
CD-1: That is kinda true though.
AJ: Consistently, over and over again.
CD-1: Yeah.
AJ: We were saying, you know, you have your favorites and you might watch them, and you're gonna just realy quick jerk and you're just like, "oh yeah that gets me off," you know, and that happens...
CD-1: [laughing]
AJ: ...but why do you need terabytes of this shit?
CD-1: [laughing]...but he said he wants to send it home so then he's got it when he gets home.
AJ: Yeah I know, great....
CB: He's gonna get caught (UI),

[later in conversation]

AJ: But I can always get it from Bill if I decide (UI).
CB: Yeah until Bill gets close to the door and sends it home.
AJ: Yeah.
CD-1: Yeah, because I asked him, I was like, I was like, "God damn you put a lot of videos on there." He was like, "those were all Anthony." I was like...
AJ: (UI) because he don't like the videos that I like (UI).
CD-1: There's nothing wrong with 'em. They're fine.
AJ: (UI) complaining, he was just like, "you only download what you like," and I'm like, well...
CD-1: You only download what you like...[laughing]
CB: (UI) that one particular series, every time he starts talking it's that series.
CD-1: Yes – every single time.
AJ: (UI) the Gerber series...
CD-1: God damn, the Gerber and The Boy Party and the P101.
AJ: Yeah.

c. Jeffries and CD-1 also discussed Jeffries' concern about secrecy and the number of inmates who knew about their access to CP in FCI Ft. Dix:

AJ: Just like a fucking kid in a candy store. I just, as much as I trust Bill, I don't trust, like I would trust Jay to keep a secret, and not at the same time you know what I mean? It's like, because he actively talks.

CD-1: Yes he does.

AJ: ...and he doesn't know what he's talking about sometimes.

CD-1: He's the one I freaked out on in the chow hall.

AJ: Yeah I know, that's what I mean. Like he's just talking to Bill and even though Bill knows the secret, he's talking when other people can hear, like, and he's an idiot.

CD-1: And they're hanging on his words too, like what the...what are you talking about?

AJ: "(UI) phone and SD Card...What?"

CD-1: "Yeah, porn, ohhhh....," yeah I mean, that, that's why I, see that almost ended my little sort of working relationship with Jay because I was like whooaaaa buddy, holy crap.

AJ: Yeah, it's like, I don't trust him either.

CD-1: I don't trust him at all...

AJ: I still don't trust him at all...

CD-1: Oh my God.

AJ: Honestly, um, I'm honestly surprised that the circle has stayed as small as it has. Like....

CD-1: I don't think it has.

CONCLUSION

66. For the foregoing reasons, there is probable cause to believe, and I do believe, that the defendants for whom I seek authorization of criminal complaints in connection with this Affidavit – namely, **Good, Noble, and Bush** – have committed the **Subject Offenses**.