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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : **TO BE FILED UNDER SEAL**  
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 v. : Hon. Michael A. Hammer  
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 ANNA KLINE : Mag. No. **22-13211**  
 a/k/a JORDANA WEBER :  
 a/k/a ANA BOURNE : **CRIMINAL COMPLAINT**  
 a/k/a ANA TORRES :

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

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

Elizabeth Hornberger  

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Elizabeth Hornberger, Special Agent  
Federal Bureau of Investigation

Special Agent Hornberger attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A).

August 6, 2022 at  
Newark, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

/s/ Michael A. Hammer (ESH)  
Signature of Judicial Officer

Signed by Special Agent at Judge Hammer's direction pursuant to F.R.C.P. 4.1(b)(6)(C).

**ATTACHMENT A**

**COUNT ONE**

**(Falsification of Records in a Federal Investigation)**

Between in or around April 2020 and in or around October 2021, in the District of New Jersey and elsewhere, the defendant

ANNA KLINE  
a/k/a JORDANA WEBER  
a/k/a ANA BOURNE  
a/k/a ANA TORRES,

knowingly and intentionally altered, concealed, covered up, falsified, and made false entry in records and documents with the intent to impede, obstruct, or influence the investigation or proper administration of a matter within the jurisdiction of a department or agency of the United States, namely, the United States Attorney's Office for the District of New Jersey and the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1519.

## **ATTACHMENT B**

I, Elizabeth Hornberger, am a Special Agent with the Federal Bureau of Investigation. I am familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and in part unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **BACKGROUND**

1. At various times relevant to this Complaint:
  - a. The defendant, ANNA KLINE a/k/a JORDANA WEBER a/k/a ANA BOURNE a/k/a ANA TORRES (“KLINE”) was a resident of La Crosse, Wisconsin and Sparks, Nevada.
  - b. KLINE and Jason Torres (“Torres”) shared a child together and resided together in South Lake Tahoe, California from in or around 2018 through in or around July 2019.
  - c. Attorney-1 was a licensed attorney retained to represent KLINE in connection with criminal charges filed in the District of New Jersey.
  - d. Cellebrite was a digital forensics company that provided tools for the collection, analysis, and management of digital data, including data retrieved from cellular phones. Cellebrite tools could be used to extract data from digital devices, including cellular phones, and generate a report of the extraction, known as a Cellebrite report.

### **PROBABLE CAUSE**

2. Since in or around October 2018, the FBI has been investigating a fraudulent advance fee scheme executed by KLINE and Torres (the “Fraud Scheme”). As a result of that investigation, on July 31, 2019, KLINE and Torres were arrested in California pursuant to a Complaint signed by Magistrate Judge Cathy L. Waldor, District of New Jersey (Mag. 19-7380 (CLW)) (the “Complaint”).

#### The Fraudulent Cellebrite Report

3. On or about January 23, 2021, KLINE, through Attorney-1, provided the Government with a .pdf document that purported to be a portion of a Cellebrite report showing iMessages between KLINE and Torres that

allegedly were exchanged on January 4, 2020 (the “Fraudulent Celebrite Report”). KLINE provided the Fraudulent Celebrite Report to the Government in an effort to exculpate herself on the charges contained in the Complaint. Specifically, the Fraudulent Celebrite Report contained iMessages that appeared to show Torres threatening KLINE and suggested that Torres was primarily responsible for the Fraud Scheme.

4. According to information provided by Attorney-1, the Fraudulent Celebrite Report was generated from an extraction performed on an iPhone belonging to KLINE. According to Attorney-1, the phone belonged to KLINE from in or about October 2019 through in or about October 2020. Attorney-1 further advised that the Fraudulent Celebrite Report was generated by a forensic examiner named “Drew Andrews” (“Andrews”) in April 2020 as part of a family court proceeding in California involving KLINE and Torres.
5. After receiving the Fraudulent Celebrite Report, the Government conducted a forensic analysis of the document, which revealed numerous anomalies that led the Government to conclude that the document was falsified. Specifically, a review of the Fraudulent Celebrite Report revealed the following, among other discrepancies:
  - a. Numerous messages contained in the Fraudulent Celebrite Report were assigned invalid characters or values. Specifically, every message contained in a Celebrite report is assigned a value using a numbering system known as hexadecimal, which allows for the representation of large numbers using fewer digits. In a legitimate Celebrite report, the hexadecimal numbering system only uses the following digits or letters: 0, 1, 2, 3, 4, 5, 6, 7, 8, 9, A, B, C, D, E, and F. Several of the messages contained in the Fraudulent Celebrite Report, however, were assigned values that contained characters not possible when using a hexadecimal numbering system, including the letters G, K, P, Q, R, S, T and X.
  - b. Several messages contained in the Fraudulent Celebrite Report displayed inconsistent “sent” and “received” timestamps. For example, one message was displayed as being sent at 7:02:58 PM UTC-5. However, the timestamp for when the message was delivered was 7:02:52 PM UTC-5, prior to the message supposedly being sent.
  - c. Certain messages also included incorrect “sent” and “read” status labels. Specifically, each message included in a Celebrite report is described by a “direction” (outgoing or incoming) and a “status” (read or sent). An “outgoing” message, if successfully sent, will be designated as “sent” and an “incoming” message, if successfully received, will be designated as “read.” At least one “outgoing” message contained in the Fraudulent Celebrite

Report was incorrectly designated as “read,” instead of “sent.”

6. On or about January 26, 2021, the Government advised Attorney-1 of its findings regarding the Fraudulent Cellebrite Report.

#### The Family Court Proceeding/“Andrews”

7. As part of this investigation, law enforcement confirmed that in or around May 2020, KLINE and Torres were engaged in a custody dispute in a family court proceeding in California (the “Family Court Proceeding”). During the Family Court Proceeding, KLINE offered the Fraudulent Cellebrite Report as evidence. KLINE further presented evidence that the Fraudulent Cellebrite Report was generated by “Andrews.” Additionally, during the Family Court Proceeding, KLINE presented testimony from a forensic examiner (“FE-1”) who testified that he communicated with “Andrews” by email.
8. KLINE additionally provided the California Family Court with a sworn declaration purportedly made by “Andrews” (the “Andrews Declaration”) in which “Andrews” claimed to have numerous forensic certifications, including several certifications associated with Cellebrite. According to information provided by Cellebrite, no one using the name “Drew Andrews” or “Andrew Andrews” possessed any certifications issued by Cellebrite.

#### The Andrews Google Account

9. Through this investigation, law enforcement learned that “Andrews” used the email account drewan.fd@gmail.com (the “Andrews Google Account”) to communicate with both Attorney-1 and at least one other forensic examiner (“FE-2”) regarding the Fraudulent Cellebrite Report.
10. According to FE-2, on or about February 13, 2021, an individual named “Morgan,” claiming to be “Andrews” secretary, contacted FE-2 to determine if FE-2 could authenticate the Fraudulent Cellebrite Report. FE-2 stated that “Morgan” contacted him from a phone number ending in 8318 (the “8318 Number”). FE-2 further stated that “Andrews” communicated with FE-2 by email using the Andrews Google Account.
11. On or about February 17, 2021, FE-2 received at least two emails from the Andrews Google Account regarding the Fraudulent Cellebrite Report (the “February 17, 2021 Emails”). In the first email, “Andrews” provided FE-2 with instructions about an apparent anticipated call between FE-2 and Attorney-1. “Andrews” stated, in part:

I suspect [Attorney-1] will ask you to send [FE-1] the raw data, since he’s asked me to. A few issues with this as I mentioned before is that I’m gone for another week or longer because of a personal matter. In addition to that, that’s not our typical policy because we don’t want anything to happen with the data.

I would go over the three concerns that [FE-1] told me with the attorney which are:

1. Font difference
2. Caps/lowercase on the “sent” or “read”
3. Message 255 where it says read and not sent

I would relay to him that this isn’t completely unusual since myself and other experts have seen it before....

....

I would confirm and verify that we not only verified the authenticity of the reports, but we cross examined it with the actual phone and axiom. Give him certainty that there was not wrong (sic) with the reports and we stand behind them. Relay to him that if it’s needed we can also provide a report, declaration and affidavit if that’s needed.

12. In the second email, “Andrews” provided a timeline of the events surrounding the creation of the Fraudulent Cellebrite Report. “Andrews” stated, in part:

[on] April 20<sup>th</sup> (Approx) was introduced to the client (Kline) through her family attorney and a contact at the attorneys office. The purpose was to extract and conduct an IOS iPhone...and to conduct reports on the dates I previously mentioned. There was supposed threats in those text messages and it needed to be verified in the family court in California.

April 25<sup>th</sup> Device was sent to me so that I could cross examine the phone with the cellebrite report

April 28<sup>th</sup> (sic) Provided the report to the client through her family attorney and through the other expert, [FE-1], who was going to analyze the report and testify in court.

13. FE-2 stated that he repeatedly advised both “Morgan” and “Andrews” that he could not authenticate the Fraudulent Cellebrite Report without examining the original data used to create the Fraudulent Cellebrite Report. “Morgan” and “Andrews” repeatedly told FE-2 that they would send him a cellular phone containing the original data used to create the Fraudulent Cellebrite report, but FE-2 never received the device.
14. According to Google records, the Andrews Google Account was registered on or about April 29, 2020, approximately 13 days before the Andrews Declaration was signed. An IP Address ending in 167 (the “167 IP Address”)

was used to register the Andrews Google Account and agree to Google's terms of service.

15. Based on this investigation, the 167 IP Address resolved to Charter Communications ("Charter"), a telecommunications company headquartered in Connecticut. According to records obtained from Charter, the 167 IP Address was subscribed to by KLINE, using the name Jordana Weber, at an address in La Crosse, Wisconsin (the "La Crosse Address") where KLINE resided with her father while released on bail from in or around September 2019 through in or around November 2020.
16. Further, a review of Google records revealed that between on or about January 27, 2021 and on or about March 2, 2021, the Andrews Google Account was consistently accessed from IP Addresses that resolved to an account held at AT&T (the "AT&T Account"). According to AT&T records, the AT&T Account resolved to an address in Sparks, Nevada (the "Sparks Address"). Based on this investigation, KLINE currently resides at the Sparks Address and has resided there since approximately November 16, 2020.
17. On the date of the February 17, 2021 Emails, the Andrews Google Account was logged into from the AT&T Account.
18. Additionally, according to Google records, the phone number associated with the Andrews Google Account was a number ending in 0301 (the "0301 Number"). According to records provided by J2 Web Services ("J2"), a telecommunications company headquartered in California, an account associated with 0301 Number was created on or about December 12, 2019, approximately four months following KLINE's arrest (the "J2 Account"). According to J2 records, the J2 Account was created from the 167 IP Address, which resolved to the La Crosse Address.
19. A review of IP Address records associated with calls made to and from the 0301 Number further revealed numerous connections from the 167 IP Address between in or around January 2020 and in or around September 2020 while KLINE was residing at the La Crosse Address. Beginning in or around December 2020, IP records associated with calls made to and from the 0301 Number showed connections from an IP Address ending in 180, which resolved to a location near Sparks, Nevada where KLINE moved in November 2020.
20. Finally, according to records provided by Pinger, a telecommunications company headquartered in California, the 8318 Number was associated with an account created on or about October 6, 2020 (the "Pinger Account"). A review of records provided by Pinger revealed numerous logins to the Pinger Account from both the 167 IP Address and the 180 IP Address on dates when KLINE was known to be residing at both the La Crosse and Sparks Addresses.

21. Based on the foregoing, there is probable cause to believe that KLINE controlled the Andrews Google Account. There is further probable cause to believe that KLINE controlled the 0301 and 8318 Numbers, which were used to communicate with FE-2. Thus, there is probable cause to believe that “Andrews” and “Morgan” were alter egos of KLINE that KLINE used to deceive the Family Court, Attorney-1, and FE-2 into believing that the Fraudulent Cellebrite Report was legitimate.

### The Fraudulent iTunes Backup

22. In or around September 2021, the Government was advised by Attorney-1 that KLINE discovered an iTunes backup (the “Backup”) on a computer that purportedly contained the alleged text messages from Torres referenced in Paragraph 3. According to Attorney-1, the Backup was analyzed by a new forensic examiner (“FE-3”) who ran the Backup through a new version of Cellebrite as well as the version of Cellebrite purportedly used by “Andrews.”

23. On or about September 28, 2021, law enforcement interviewed FE-3. According to FE-3, KLINE provided a copy the Backup to FE-3 on an external hard drive. FE-3 stated that the Backup was retrieved from a computer (the “KLINE Computer”), but that FE-3 did not analyze the KLINE Computer itself, only the Backup provided by KLINE. According to FE-3, after he received the external hard drive containing the Backup, he ran a Cellebrite extraction and generated a full Cellebrite report. FE-3 confirmed that the messages contained in the Fraudulent Cellebrite Report appeared in the Cellebrite report generated by FE-3.

24. On or about September 30, 2021, Attorney-1 advised the Government that KLINE planned to send the KLINE Computer to FE-3 who was going to create a forensic image of the KLINE Computer. Attorney-1 further advised that the forensic image of the KLINE Computer created by FE-3 would be made available to the Government for review.

25. On or about October 1, 2021, the Government requested access to the KLINE Computer itself in order to make its own forensic image rather than relying on an image created by FE-3.

26. On or about November 3, 2021, law enforcement forensically imaged the KLINE Computer at Attorney-1’s office. The Government subsequently conducted an analysis of data retrieved from the forensic image of the KLINE Computer, including the Backup. A review of that data revealed that data on the KLINE Computer, including data associated with the Backup, had been manipulated by a user of the device. Specifically, a review of data retrieved from the KLINE Computer revealed, among other things, the following:

- a. The Fraudulent Cellebrite Report identified the device that had been analyzed as “Anna’s iPhone,” however the Backup obtained



from the Kline Computer identified the device that had been analyzed as “Tom’s iPhone.”

- b. The size of the files contained in the Fraudulent Celebrite Report and the Backup obtained from the KLINE Computer were different in size by more than nine million bytes.
- c. The data contained in the Backup located on the KLINE Computer was already decoded, which is inconsistent with how Apple creates an authentic iTunes backup. The fact that the data had been decoded demonstrated user manipulation of the data on the KLINE Computer.
- d. Numerous timestamps of messages retrieved from the Backup did not match the timestamps reflected in the Fraudulent Celebrite Report.
- e. An analysis of the Backup revealed that it contained approximately 53,770 files and subfolders. Of those 53,770 files and folders, at least 51,129 had the same exact file creation date and time of April 27, 2020 at 10:33:48 P.M. Based on my training and experience and information learned during this investigation, I know that the timestamps attached to such files are created at the time when the data is written to the hard drive of the computer. Accordingly, it is highly improbable that such a large amount of files could have been written to the hard drive of the KLINE Computer at the exact same second.
- f. In addition, approximately 221 files contained in the Backup contained a “creation” timestamp of April 27, 2020 between 10:29:16 and 10:33:35 PM UTC-5, which was prior to the time when the actual folder containing the files was created on April 27, 2020 at 10:33:48 UTC-5.
- g. A review of the KLINE Computer further revealed a text file stored on the computer that detailed the history of user typed commands entered into PowerShell, a Microsoft task automation program. A review of the commands revealed that a user of the KLINE Computer manipulated date and time stamps of data stored on the computer, including data associated with the Backup. Specifically, the commands revealed that a user of the KLINE Computer entered a command that directed the creation and “write” time of certain files on the KLINE Computer to be changed to April 27, 2020, consistent with the discovery that more than 51,000 messages contained in the Backup had the same creation date and time on April 27, 2020. The commands further showed that a user of the KLINE Computer entered

commands that directed the computer to delete all files with a creation or “write” date of October 5, 2021.

27. Based on the forensic analysis of the KLINE Computer, there is probable cause to believe that KLINE intentionally manipulated, or caused to be manipulated, data on the KLINE Computer on October 5, 2021, approximately four days after the Government’s request to make its own forensic image of the KLINE Computer. Further, following the manipulation of data on October 5, 2021, KLINE then changed, or caused to be changed, certain time stamps on the KLINE Computer to make it appear as if the Backup and other files stored on the KLINE Computer were created on April 27, 2020, when the fictional “Andrews” purportedly ran the Fraudulent Celebrite Report. Based on this information, there is probable cause to believe that KLINE intentionally manipulated, or caused to be manipulated, the KLINE Computer and the Backup in an attempt to deceive the Government into believing that the purported messages from Torres were authentic.