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

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Hon. Lois H. Goodman
 :
 RODFORD W. BRINDLEY, JR. : Mag. No. 12-4516 (LHG)

I, Joshua Wilson, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 2, 2012, in Ocean County, in the District of New Jersey, and elsewhere, defendant RODFORD W. BRINDLEY, JR.

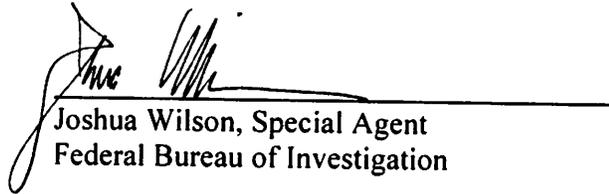
did knowingly employ, use, persuade, induce, entice, and coerce a minor, "JOHN DOE," who was then less than 2 years old, to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, and the visual depiction was transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

in violation of Title 18, United States Code, Section 2251(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:

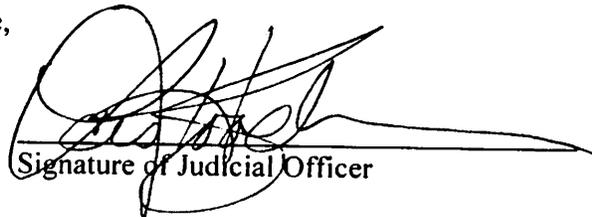
SEE ATTACHMENT A

continued on the attached page and made a part hereof.


Joshua Wilson, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
May 22, 2012 at Trenton, New Jersey

HONORABLE LOIS H. GOODMAN
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

AFFIDAVIT

I, Joshua Wilson, a Special Agent with the Federal Bureau of Investigation (“FBI”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about March 27, 2012, a Detective of the Westerville Police Department in Ohio, working with the Franklin County Sheriff’s Department, and as a member of the local Internet Crimes Against Children Taskforce, was conducting an undercover chat session with Yahoo! screen name tarena16. The undercover officer (the “UC”) had previously made contact with this individual on a pornographic website known to be frequented by individuals interested in child pornography. The UC was representing himself/herself as a single mother, residing in Ohio. The individual using screen name tarena16 had previously identified himself as “Rod”, living in “central NJ.”
2. In this chat, tarena16 stated that he had been sexually involved with minors on multiple occasions. He also stated that he had recently engaged in sexual activity with a six year-old girl whose mother he had met online.
3. On or about April 2, 2012, tarena16 and the UC engaged in another online chat. During this chat, tarena16 indicated that he was currently babysitting an 18 month-old boy, his paramour’s child, and that he had “touched sucked” this boy, prior to this chat session. Tarena16 activated a webcam feed to show a clothed adult male holding a clothed toddler, who appeared under the age of two years old. The adult male was later identified as RODFORD W. BRINDLEY JR. of Toms River, New Jersey. The UC had previously told BRINDLEY that he/she did not have a webcam available, so BRINDLEY would not be able to see the UC. BRINDLEY asked the UC, “are u sitting there hoping ill do something with him now but don’t want to ask me[.]” The UC responded, “lol....I would never ask...that would be inappropriate given our relationship at this point.” BRINDLEY subsequently requested reassurance that the UC was a real female. The UC offered to call BRINDLEY, and BRINDLEY provided a telephone number. The UC requested BRINDLEY to re-activate his webcam, while a female detective called the number BRINDLEY had provided. Without encouragement from the female detective, BRINDLEY proceeded to broadcast sexual contact with the toddler via the webcam. This contact was recorded by screen capture software utilized by the UC. This contact is described below:

BRINDLEY appears on the webcam, visible from the waist up. He is wearing a grey short sleeved shirt, eyeglasses, and small headphones in his ears. BRINDLEY subsequently appears holding the toddler on his lap at the computer. The toddler appears to be wearing a white short-sleeved “onesie” that is unfastened at the bottom. BRINDLEY holds the toddler up, pulls off his diaper, and spreads his legs. BRINDLEY then proceeds to masturbate the boy’s penis with his left hand. Then, while holding the

naked toddler with his left arm, BRINDLEY stands up, pulls down his own pants and manipulates his own penis with his right hand. BRINDLEY's wedding ring is clearly visible on his left hand while he is holding the boy. BRINDLEY subsequently appears to place the toddler on the floor, out of view of the camera. BRINDLEY later appears on camera again with the toddler on his lap. BRINDLEY proceeds to lift the toddler to his upper chest so that the toddler is on his back lying across BRINDLEY's chest and his buttocks are facing the camera. BRINDLEY then puts his face between the legs of the toddler and performs fellatio on the toddler.

4. On April 2, 2012, an exigent law enforcement request was submitted and answered by Cingular Wireless/AT&T identifying "Rod Brindley" residing at an address in Toms River, New Jersey, as the financially liable party for the cell phone number BRINDLEY had previously provided to the UC.
5. On April 2, 2012, an exigent law enforcement request was submitted and answered by Yahoo! for screen name tarena16. Yahoo! was able to provide information that screen name tarena16 had utilized Internet Protocol ("IP") address 68.32.187.242 several times during the preceding days. A subsequent exigent law enforcement request was submitted to Comcast, the owner of IP address 68.32.187.242, revealing that this IP address was assigned to subscriber "Rod Brindley" of the same address in Toms River, New Jersey.
6. Law enforcement in New Jersey were notified and local search warrants were executed at BRINDLEY's home in Toms River and his vehicle. BRINDLEY was confirmed to be the adult male on the webcam. The victim toddler, born in December of 2010, was also identified. BRINDLEY was arrested on state charges of Child Endangerment and for Child Pornography offenses.