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JAN 19 2012

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

TONIANNE J BONGIOVANNI  
U.S. MAGISTRATE JUDGE

UNITED STATES OF AMERICA

v.

JENNIFER MAHONEY

:  
: Hon. Tonianne J. Bongiovanni  
:  
: Mag. No. 12-5004  
:  
: **CRIMINAL COMPLAINT**

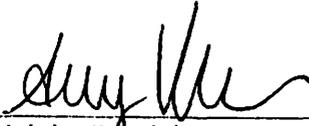
I, Amy Veivia, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**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.



\_\_\_\_\_  
Amy Veivia, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

January 19, 2012  
Date

at

Trenton, New Jersey  
City and State

Honorable Tonianne J. Bongiovanni  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

**Sexual Exploitation of Children**

On or about October 2, 2011, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

JENNIFER MAHONEY

did knowingly employ, use, persuade, induce, entice, and coerce a minor, "JANE DOE," who was then 5 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).

**COUNT TWO**

**Sexual Exploitation of Children**

On or about November 5, 2011, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

JENNIFER MAHONEY

did knowingly employ, use, persuade, induce, entice, and coerce a minor, "JANE DOE," who was then 5 years old, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was transported 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).

## ATTACHMENT B

I, Amy Veivia, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the facts set forth below as a result of my participation in this investigation as well as from my review of reports from, and discussions with, other law enforcement personnel. Where statements of others are related herein, they are related in substance and part. 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 I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 13, 2011, the FBI and other law enforcement executed a search warrant at the home of JENNIFER MAHONEY in Manalapan, New Jersey. In an interview on that date, JENNIFER MAHONEY told the FBI that she had performed oral sex on "JANE DOE," a five-year-old female, on two occasions in August or September 2011. JENNIFER MAHONEY stated that she did this while she was babysitting DOE. JENNIFER MAHONEY further told the FBI that JENNIFER MAHONEY streamed live video of one of these sexual acts to CO-CONSPIRATOR 1 ("CCI"), a man whom she believed lived in Arizona, and to one other individual. JENNIFER MAHONEY told the FBI that she used Skype, a company that provides video chat services over the Internet, to stream her conduct to CCI and to the other individual. JENNIFER MAHONEY further told the FBI that she made a video recording of the other of these sexual acts using her iPhone and that she e-mailed this video to CCI and to one other individual.

2. Before on or about December 13, 2011, law enforcement had determined that CCI lived in Texas and had executed a search warrant at CCI's home. Forensic examiners later found the following videos, among others, on computers seized during that search:

	<b>Filename</b>	<b>Description</b>
A	00000064.mp4.mpg	<p>This video is 4 minutes and 9 seconds in duration and depicts a prepubescent girl who appears to be between 4 and 6 years of age, lying on her stomach on a bed. She appears to be asleep. She is wearing only a shirt and her bare buttocks are exposed. An adult female is kneeling on the floor alongside the bed. The adult female is wearing a lace top with her breasts exposed, is not wearing pants, and her vagina is exposed. Standing, the adult female spreads the buttocks' cheeks of the girl and begins licking between the buttocks' cheeks and around the anus area. The adult female then uses her hand to rub the buttocks of the girl. The adult female then moves onto the bed and continues to lick the anus area and kiss the buttocks' cheeks of the girl. The adult female uses her right hand and begins touching her own vagina. The adult female touches her breasts and then touches the girl's buttocks. The adult female then rolls the girl over onto her back and the girl's bare vagina is exposed.</p> <p>There is no audio; however, it appears that the adult female is talking and laughing during the video and it appears that the adult female is talking to another person over the Internet via a webcam.</p>
B	00000069.mp4.mpg	<p>This video is 4 minutes and 19 seconds in duration and depicts a prepubescent girl who appears to be between 4 and 6 years of age, lying on a bed. She appears to be asleep. She is wearing a shirt and her bare buttocks are exposed. An adult female is sitting next to her. The adult female uses her right hand to rub the buttocks and anus area of the girl. The adult female uses her right middle finger and rubs from the girl's anus to the girl's vaginal area. The adult female then appears to lick the girl's anus and vaginal area. The adult female then rubs the girl's buttocks with her hand. The adult puts her mouth in the anus and vaginal area of the girl again and then licks and kisses the buttocks' cheeks of the girl. There is no audio.</p>
C	IMG_1173(1).mov	<p>This 54-second video depicts a prepubescent girl who appears to be between 4 and 6 years of age, in the bathtub. An adult female is bathing her. At one point the adult female tells the girl to "lean over sweetheart so I can rinse you." The girl says "like a mermaid?" and the adult responds "like a mermaid sweetheart." The girl then lies on her stomach in the tub and the adult female begins to rub the buttocks and anus area of the little girl. The adult female then spreads the little girl's legs and it appears the adult is inserting her middle finger into the vaginal area of the girl.</p>

3. I was present during of the search of JENNIFER MAHONEY's home on December 13, 2011, and had an opportunity to view her and interview her. I had an opportunity to view DOE in person on or about December 13, 2011. The faces of the adult female and minor female are visible on Videos A and B in paragraph 2. The face of the minor female is visible on Video C in paragraph 2. The hand and arm of the adult female is visible, and the adult female's voice can be heard, on Video C in paragraph 2. Based on my review of the videos and

interaction with JENNIFER MAHONEY and DOE, I have determined that the videos depict JENNIFER MAHONEY engaged in sexually explicit conduct with DOE. Based on my review of law enforcement photographs taken during the December 13, 2011, search of JENNIFER MAHONEY's home, I have determined that Videos A and B in paragraph 2 depict JENNIFER MAHONEY's bedroom. Based upon my review of the same photographs, I have determined that Video C in paragraph 2 depicts a brown bathtub similar in appearance to a brown bathtub in JENNIFER MAHONEY's home.

4. Law enforcement has determined that DOE is five years old.

5. An FBI forensic examiner reports that the files described as Videos A and B in paragraph 2 were saved on CCI's computer on or about October 2, 2011. Videos A and B appear to be two video recordings made from a single video-chat session with JENNIFER MAHONEY.

6. An FBI forensic examiner reports that the file described as Video C in paragraph 2 above was created using an iPhone and was saved to CCI's computer on or about November 5, 2011.