
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 14-5032
 :
 v. : Hon. Tonianne J. Bongiovanni
 :
 CHAD C. WEBER :
 :
 : **AMENDED CRIMINAL COMPLAINT**

I, David M. Fallon, 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 Department of Homeland Security, Homeland Security Investigations, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



David M. Fallon, Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,
on June 3, 2014, in Trenton, New Jersey



HONORABLE TONIANNE J. BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE

RECEIVED

JUN 3 - 2014

TONIANNE J. BONGIOVANNI
U.S. MAGISTRATE JUDGE

ATTACHMENT A

On or about April 20, 2013, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

CHAD C. WEBER

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been transported in interstate and foreign commerce by any means, including by computer.

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

ATTACHMENT B

I, David M. Fallon, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. 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. In or about April 2013, law enforcement learned that an individual later identified as defendant Chad C. Weber ("Weber") had established an online relationship with a 12 year-old girl from Pennsylvania (referred to herein as the "Victim"). HSI agents have obtained and reviewed copies of various chat logs and other internet-based messages which reflect Weber's online communications with the Victim between in or about February 2013 and in or about April 2013. Many of these communications were sexually explicit. Weber and the Victim also traded sexually explicit photographs of each other through the internet, and discussed the photographs in online chats. During some of these communications, Weber expressly acknowledged that the Victim was 12 years old.
2. On or about August 15, 2013, law enforcement executed a search warrant at Weber's residence in Monmouth County, New Jersey.
3. During the search of Weber's residence, Weber agreed to speak to law enforcement. After being advised of his Miranda rights, Weber admitted, among other things:
 - a. Weber was the individual chatting with the Victim in the electronic communications reviewed by law enforcement;
 - b. Some of Weber's communications with the Victim were sexually explicit and included "sexting," meaning discussing specific sexual acts with the Victim that he wanted to perform on her.
 - c. Weber was aware that the Victim was 12 years-old at the time of these communications.
 - d. Weber received naked pictures of the Victim over an instant messaging platform installed on his cellular phone, including a picture of the Victim inserting a plastic item in her vagina. Weber asked the Victim to send him sexually explicit photographs of her. Weber also sent the Victim sexually explicit pictures of himself, including pictures of his penis.
4. A forensic review of the computers and electronic media that law enforcement seized from Weber's residence on August 15, 2013 revealed that Weber had received at least 18

sexually explicit photographs of the Victim, including photographs in which the Victim's genitals were exposed. Three of these photographs that were found on Weber's cellular telephone are described in the table below:

File Name	Approximate Date Received by Weber	Description
74eb7a99-a9c5-43aa-8388-83cb363fb2ba.jpg	April 20, 2013	This image is a close up of a pubescent naked female's bottom lying on a zebra striped sheet. Her legs are open and her left hand's fingers are on her vagina.
ea575ee3-a263-4964-9e1c-2f94aa4f3661-1.jpg	January 29, 2013	This image depicts a pubescent female standing nude in front of a mirror in a bathroom. She is holding her right breast with her right hand and her head is bent down with her tongue out. She is holding a black cell phone in her other hand.
Bf44c72d-713c-4a3b-b22c-b7718ee493cc.jpg	January 28, 2013	This image is close-up of a pubescent female's vagina on a beige shag carpet. Her right hand's pointer and middle fingers are penetrating her vagina.

5. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images described above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet, based upon, among other things, their file names and presence on Weber's cellular telephone.