

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

Todd Baldwin

Case No. **CR 24-71486-MAG***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 December 2022 to August 2023 in the county of Santa Clara in the
Northern District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 2422(b)

Offense Description

Enticement of Minors

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Colleen Dettling.

☒ Continued on the attached sheet.

Approved as to form /s/
AUSA Marissa Harris

/s/ Colleen Dettling w/permission by VKD*Complainant's signature*Colleen Dettling, Special Agent, FBI*Printed name and title*

Sworn to before me by telephone.

Date: 10/10/2024City and state: San Jose, CA

Virginia K. DeMarchi
Judge's signature

Hon. Virginia DeMarchi, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT OF SPECIAL AGENT COLLEEN DETTLING
IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Colleen Dettling, Special Agent of the United States Department of Justice, Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

OVERVIEW AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7). As a federal agent, I am authorized to investigate violations of the laws of the United States, and I am a law enforcement officer with authority to execute warrants issued under the authority of the United States.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging **TODD BALDWIN** with two counts of violating 18 U.S.C. § 2422(b)– Enticement of a Minor. More specifically, as set forth in detail below, there is probable cause to believe that from approximately December 2022 to approximately August 2023, Baldwin used the internet and other means and facilities of interstate and foreign commerce to persuade, induce, and entice Minor Boy 1 (Count One), a 17-year-old male, and Minor Boy 2 (Count Two), a 16-year-old male, to produce child pornography images and videos (in violation of 18 U.S.C. § 2251) in exchange for money.

3. I have been employed as a Special Agent with the Federal Bureau of Investigation since 2009. I am currently assigned to Squad C15 of the San Francisco Field Office, San Jose Resident Agency. Squad C15 is responsible for investigating violent crimes against children. As an FBI Special Agent, I have investigated federal criminal violations relating to high technology and cyber-crimes, child exploitation, and child pornography. I have conducted, coordinated, and participated in the execution of numerous search warrants in child pornography-related

investigations conducted by the FBI and local law enforcement agencies. I have received training in the investigation of child pornography and child exploitation and have observed and reviewed numerous examples of child pornography in all forms of media, including computer media. I have attended training relating to child exploitation and pornography at multiple law enforcement seminars, and through training, experience, and interaction with other law enforcement officers and agents, I have become familiar with the manner in which individuals produce, receive, distribute, and store child pornography.

4. The facts stated in this affidavit are based on my personal knowledge, on my review of reports prepared by other law enforcement officers and records prepared by others, and on conversations I have had with other law enforcement officers involved in this investigation. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant; it does not set forth each and every fact that I, or others, have learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the complaint sought herein. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part.

APPLICABLE STATUTES

5. 18 U.S.C. § 2422(b) prohibits using the mail or any means or facility of interstate or foreign commerce to knowingly persuade, induce, or entice any person under the age of 18 to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, as well as attempts to do so.

6. 18 U.S.C. § 2427 states that “sexual activity for which any person can be charged with a criminal offense” does not require interpersonal physical contact, and includes the production of child pornography, as defined in 18 U.S.C. § 2256(8).

7. Based on my training and experience, I know that internet-based websites and applications, including email, social media, and online payment applications (such as Venmo and CashApp) are well-known facilities of interstate and foreign commerce.

FACTS ESTABLISHING PROBABLE CAUSE

8. In August 2023, the San Jose Police Department (SJPd) received information that Todd Baldwin, the Operations Manager, Teaching Assistant, and sports coach at Valley Christian High School in San Jose, was paying students at the school to create child pornography. Thereafter, law enforcement interviewed witnesses who provided information relevant to these allegations and conducted further investigation that corroborated these witness statements. The statements of two of those witnesses and portions of the ensuing investigation are summarized below, with the witnesses identified in this affidavit as Minor Boy 1 and Minor Boy 2.

Enticement of Minor Boy 1

9. On August 16, 2023, SJPd detectives interviewed Minor Boy 1. Minor Boy 1 was a student at Valley Christian and one of Baldwin’s Teacher Assistants. Minor Boy 1 stated that in October 2022, he approached Baldwin and asked him if the school had any work for him to do. Baldwin asked if Minor Boy 1 wanted to make money or to gain experience. Minor Boy 1 said he wanted to make money. Baldwin then proposed that Minor Boy 1 take pornographic

images and videos of himself, which Baldwin would then sell on Reddit. Baldwin offered to split any proceeds from the sale of Minor Boy 1's pornographic images and videos.

10. In approximately December 2022, Minor Boy 1 began to take images and videos of himself masturbating and posing in a sexual manner and sent them to Baldwin via Snapchat and Gmail. Minor Boy 1 sent numerous pictures and videos every week for a number of weeks. Approximately 75% of them were sexually explicit. Baldwin bought Minor Boy 1 a ring light to improve the quality of the images and videos produced. Minor Boy 1 stated that Baldwin sold the photos and videos to buyers on Reddit and they would split the proceeds from the sales. Baldwin also provided underwear for Minor Boy 1 to wear during athletic practice and then return to Baldwin. Baldwin then sold the soiled underwear online and split the proceeds with Minor Boy 1.

11. Minor Boy 1 recalled that Baldwin arranged an in-person photo shoot in his office at Valley Christian. During this photo shoot, Baldwin took numerous images of Minor Boy 1 posing naked in a sexual manner. Baldwin used a digital camera to take the images and later paid Minor Boy 1 several hundred dollars.

12. According to Minor Boy 1, Baldwin designated Minor Boy 1 and some of his friends (including boys who later provided sexual images to Baldwin) as Teacher Assistants.

13. Minor Boy 1 identified Minor Boy 2 and other boys as other individuals whom Baldwin recruited to provide pornographic images and videos to Baldwin.

14. Minor Boy 1 stated that he stopped providing images and videos to Baldwin around mid-August 2023. Between December 2022 and August 2023, Minor Boy 1 was 17 years old.

15. On August 29, 2023, SJPD detectives obtained a state search warrant for Baldwin's Gmail account and located numerous pornographic videos and images sent from Minor Boy 1's email (identified based in part on Minor Boy 1's statement) to Baldwin's Gmail account (identified based in part on Baldwin's later admission).

16. On January 12, 2024, I obtained a federal search warrant for Baldwin's Venmo account (identified based in part on Baldwin's later admission) and located at least 28 Venmo payments from Baldwin to Minor Boy 1's account (identified based in part on Minor Boy 1's statement) between December 2022 and August 2023 totaling \$4,265. Based on the timing and nature of these payments as they relate to other facts gathered in the investigation, I believe it is reasonable to conclude that the payments from Baldwin to Minor Boy 1 are related to Minor Boy 1's transmission of child pornography to Baldwin.

Enticement of Minor Boy 2

17. On August 21, 2023, SJPD Detectives interviewed Minor Boy 2, a student at Live Oak High School in San Jose. Minor Boy 2 explained that Minor Boy 1 told Minor Boy 2 that Baldwin was paying Minor Boy 1 to create pornographic images and videos. Minor Boy 2 later contacted Baldwin via Snapchat and entered into a similar arrangement as described above for Minor Boy 1. Minor Boy 2 said he sent Baldwin about 20 pictures or videos 2-3 times a week for a number of weeks. Investigators later discovered numerous pornographic videos sent from Minor Boy 2's email address (as identified by Minor Boy 2) to Baldwin's Gmail account (as identified by Baldwin in a later statement). Minor Boy 2 estimated that he made approximately \$2,500 and was paid by Baldwin via Venmo.

18. Minor Boy 2 said he communicated with Baldwin using Snapchat and email. His correspondence with Baldwin stopped in early August 2023. In August 2023, Minor Boy 2 was 16 years old.

19. During my previously referenced search of Baldwin's Venmo account pursuant to a federal search warrant, I located at least 19 Venmo payments from Baldwin's account (as identified by Baldwin in a later statement) to Minor Boy 2's account (as identified by Minor Boy 2) from February to August 2023 totaling \$2,050. Based on the timing and nature of these payments as they relate to other facts gathered in the investigation, I believe it is reasonable to conclude that the payments from Baldwin to Minor Boy 2 are related to Minor Boy 2's transmission of child pornography to Baldwin.

Baldwin's Suspected Abuse of Other Boys

20. In August 2023, Baldwin was interviewed by San Jose Police Department detectives. Baldwin voluntarily agreed to speak to the detectives. Baldwin admitted to receiving nude images and masturbation videos from multiple minor boys in exchange for money, including Minor Boy 1, Minor Boy 2, and two other students at Valley Christian High School. Baldwin stated he would receive the images through Snapchat and the videos through his Google email and would sell them online. He sent the minor victims a share of the sale proceeds via Venmo and CashApp. Baldwin also confirmed his email addresses and Venmo and CashApp usernames.

21. Further witness interviews and review of Baldwin's Venmo and email accounts revealed additional pornographic videos and images along with suspicious payments involving at least three other minor boys in addition to Minor Boy 1 and Minor Boy 2.

CONCLUSION AND REQUEST FOR SEALING

22. Based on the foregoing facts, my training and experience, and consultation with other law enforcement agents with experience in child exploitation investigations, there is probable cause to believe that Todd Baldwin violated 18 U.S.C. § 2422(b), Enticement of a Minor, with respect to Minor Boy 1 (Count One) and Minor Boy 2 (Count Two). As such, I respectfully request that the Court issue a criminal complaint and arrest warrant for Baldwin.

23. I further request that the Court order that all papers in support of this complaint and arrest warrant, including the affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the investigation, cause the target to flee, destroy evidence, or intimidate victims or witnesses.

24. I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

/s/ Colleen Dettling w/permission by VKD
COLLEEN DETTLING
Special Agent
Federal Bureau of Investigation

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) on this 10 day of October 2024.


HON. VIRGINIA DEMARCHI
UNITED STATES MAGISTRATE JUDGE

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☒ COMPLAINT ☐ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

COUNTS ONE AND TWO: 18 U.S.C. § 2422(b) (Enticement of a Minor)

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attached penalty sheet

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION
DEFENDANT - U.S.

▶ Todd Baldwin

DISTRICT COURT NUMBER

CR 24-71486-MAG**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agent Colleen Dettling

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned)

Marissa Harris

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges ▶
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges
-
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

UNITED STATES V. TODD BALDWIN
PENALTY SHEET

COUNTS ONE AND TWO: 18 U.S.C. § 2422(b) (Enticement of a Minor)

Penalties:

- Minimum Prison Term: 10 years
- Maximum Prison Term: Life
- Maximum Fine: \$250,000
- Minimum Supervised Release Term: 5 years
- Maximum Supervised Release Term: Life
- Mandatory Restitution
- Forfeiture
- Potential Deportation
- Special Assessment: \$100 (Per 18 U.S.C. § 3014(a), there is an additional \$5,000 special assessment for non-indigent defendants)
- Potential Sex Offender Registration