

FILED**TD****6/24/2026****THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT****UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

THOMAS NEAL

CASE NUMBER: 26 CR 332
UNDER SEAL**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 June 17, 2026, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*Title 18, United States Code, Section
2252A(a)(1)*Offense Description*knowingly transported child pornography, as defined
by Title 18, United States Code, Section 2256(8)(A),
using a means and facility of interstate and foreign
commerce, and in and affecting interstate and foreign
commerce by any means,

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Tracy Altman by GAF

Tracy Altman

Special Agent, Homeland Security Investigations
(HSI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: June 24, 2026*Gabriel A. Fuentes*
*Judge's signature*City and state: Chicago, IllinoisGABRIEL A. FUENTES, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Tracy Altman, being duly sworn, state as follows:

1. I am a Special Agent with the Homeland Security Investigations (HSI), and have been so employed for 17 years. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that Thomas James Neal ("NEAL") knowingly transported child pornography, in violation of Title 18, United States Code, Section 2252A(a)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging NEAL with transportation of child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and my review of records, search warrant material, photographs and cell phone data.

I. FACTS SUPPORTING PROBABLE CAUSE

4. In summary, and as detailed below, on June 17, 2026, NEAL arrived at O'Hare International Airport (ORD) in Chicago, Illinois and boarded a direct, international flight, United Airlines flight 359, from ORD to Benito Juarez

International Airport (“MEX”) in Mexico City, Mexico. At the time, NEAL knowingly possessed and transported with him an Apple iPhone 14 Max Pro (“Subject Phone”) that he knew contained multiple images of child pornography. Mexican border authorities discovered the child pornography on the Subject Phone after NEAL disembarked his direct flight from ORD to MEX and was subject to a secondary customs examination by Mexican border authorities. Mexican border authorities secured the Subject Phone in NEAL’s checked baggage and placed NEAL on a direct flight to Houston, Texas where CBP officers and HSI agents conducted a border search of the Subject Phone and identified child pornography. A review of the Subject Phone pursuant to a search warrant confirmed child pornography files that pre-date NEAL’s June 17, 2026 travel from ORD to Mexico City, Mexico.

A. CBP Border Search Authority

5. I know that, pursuant to Title 19, United States Code, Section 1401(i), Customs and Border Protection (CBP) Officers and HSI Special Agents are “Customs Officers.” As Customs Officers, they have the authority to conduct border searches at the border pursuant to, among other provisions, Title 19, Code of Federal Regulation, Section 162.6, and Title 19, United States Code, Sections 1401, 1461, 1582 and 1589a.

6. I know from my training and experience that the border may include the actual border, the functional equivalent of the border, or the extended border. A functional equivalent of the border includes the customs inspection area in international terminals of United States airports.

7. The authority to conduct border searches extends to people and merchandise entering and exiting the United States. All travelers crossing the United States border are subject to routine inspection by CBP, including their mobile phones and baggage, consistent with the border search exception doctrine.

B. NEAL's June 17, 2026 Departure from Chicago to Mexico

8. According to CBP advanced passenger records, Thomas James NEAL had a ticket on United Airlines flight 359 from ORD to MEX ("UA 359"), which departed at approximately 9:19 AM CDT on June 17, 2026 from ORD.

9. According to Chicago O'Hare Security Operations Center ("ORD Security") records, on June 17, 2026, at approximately 08:23 AM CDT, NEAL was photographed entering a Transportation Security Administration ("TSA") checkpoint magnetometer.¹ Based on my review of the ORD Security surveillance photograph, NEAL is dressed in a collared gray long-sleeve shirt, cream-colored pants, and white shoes and is observed placing a silver hardtop suitcase on the magnetometer.² NEAL's clothing and luggage appear to be the same as captured in photographs taken by Mexico border authorities during their inspection of NEAL in Mexico City later

¹ NEAL was identified in the ORD Security photographs described in this paragraph based on his consistent clothing and luggage as captured in the Mexican border authorities photograph in paragraph 12 and based on a comparison with his appearance and identifiers reflected in NEAL's Illinois Secretary State Identification photograph.

² I know based on training and experience, that the TSA magnetometer is a security checkpoint after airline passengers have checked any additional luggage for their flight. Accordingly, I understand that the silver hard-top suitcase NEAL possessed at the TSA magnetometer was luggage he carried onto or checked at the gate, for his flight.

that day, as shown in paragraph 12. A second photograph provided by ORD Security shows NEAL boarding a flight at approximately 08:44 AM CDT at Gate B5.

10. According to CBP advanced passenger records, NEAL boarded UA 359, which departed at approximately 09:19 CDT from ORD to MEX.

11. According to open-source flight information, UA 359 was a direct flight with a travel time of approximately 4 hours and 26 minutes. According to open-source flight information, UA 359 arrived in Mexico City, Mexico at approximately 12:45 PM CST on June 17, 2026.

12. According to HSI Special Agent 1, after NEAL landed at MEX in Mexico City, Mexico, NEAL was selected for secondary screening by Mexican border authorities. According to HSI Special Agent 1, NEAL provided Mexican border authorities with verbal consent to search his property, which included the Subject Phone. According to HSI Special Agent 1, Mexican border authorities photographed NEAL and his luggage, as depicted below:



13. According to HSI Special Agent 1, Mexican border authorities conducted a search of the Subject Phone, and observed images they believed constituted child pornography. According to HSI Special Agent 1, in addition to the Subject Phone, NEAL possessed 8 additional electronic devices.

14. According to HSI Special Agent 1, after the secondary inspection, Mexican border authorities then placed all of NEAL's electronic devices, including the Subject Phone, in NEAL's checked baggage and zip-tied the baggage shut to

prevent tampering. According to HSI Special Agent 1, Mexican border authorities placed NEAL on United Airline flight 1025 (“UA 1025”) from MEX to George Bush International Airport (“IAH”) in Houston, Texas, with a connecting flight from IAH to ORD.

15. According to HSI Special Agent 2, and based on my review of email communications, Mexican border authorities alerted HSI officers in Houston, Texas, in summary, that NEAL had been selected for secondary screening, had consented to a search of his property, and that search had revealed child pornography images on his cellular phone. HSI Houston was also alerted that NEAL was traveling from MEX to IAH on UA 1025 and his possessions contained child pornography.

16. According to HSI Special Agent 1, Mexican border authorities provided HSI Special Agent 1 with the Subject Phone passcode.

C. June 17, 2026 Texas Border Search of NEAL’s Subject Phone

17. According to CBP advanced passenger records, UA 1025 departed MEX on June 17, 2026 at approximately 4:40 PM CST and arrived at IAH in Houston, Texas at approximately 8:00 PM CST. According to CBP advanced passenger records, NEAL was on the flight manifest.

18. According to HSI Special Agent 1, on June 17, 2026, at approximately 8:00 PM CST, HSI Special Agent 1 and other federal law enforcement officers, met with CBP Officers at IAH and joined CBP officers at the secondary inspection screening area of the international terminal of IAH.

19. According to HSI Special Agent 1, based on the information received from the Mexican border authorities, HSI and CBP officers believed NEAL may be in possession of child pornography.

20. According to HSI Special Agent 1, CBP officers directed NEAL to a secondary customs inspection after he passed through primary passport control. According to HSI Special Agent 1, CBP officers inspected NEAL's checked baggage, which still contained the zip-tie around it. Once opened, the baggage contained the Subject Phone, two laptops and six electronic storage devices.

21. According to HSI Special Agent 1, CBP officers initiated a border search for the Subject Phone and eight other electronic devices in NEAL's baggage, described above in paragraph 20.

22. According to HSI Special Agent 1 and a review of records, HSI Special Agent 1 prepared and provided NEAL with a "Custody Receipt for Seized Property and Evidence" form for the Subject Phone and the eight electronic devices. According to HSI Special Agent 1, HSI Special Agent 1 placed the Subject Phone in "Airplane Mode" for evidence preservation and to prevent evidence tampering.

23. According to HSI Special Agent 1, HSI Special Agent 1 and another HSI agent initiated an interview of NEAL at approximately 9:30 PM CST. According to HSI Special Agent 1, NEAL was read his *Miranda* rights and agreed to speak with HSI agents without an attorney. According to HSI Special Agent 1, during the interview, NEAL identified the Subject Phone as his phone but claimed he could not recall the Subject Phone's passcode. According to HSI Special Agent 1, HSI Special

Agent 1 informed NEAL that Mexican border authorities provided HSI with a five-digit passcode and asked NEAL if he would input the 5-digit code (providing the numbers) to see if it would open the Subject Phone. According to HSI Special Agent 1, NEAL entered the five-digit code and that code unlocked the Subject Phone.

24. According to HSI Special Agent 1, HSI Special Agent did a manual review of the Subject Phone pursuant to their border search authority and observed hundreds of files that constitute child pornography.

D. Subject Phone Search Warrant and Identification of Child Pornography

25. On or about June 18, 2026, the Honorable Magistrate Judge Peter Bray of the Southern District of Texas authorized a search warrant for the contents of the Subject Phone for evidence, fruits of, and contraband related to child pornography offenses and user attribution of the Subject Phone.

26. While the forensic examination is ongoing, based on my and other HSI agents' review of the Subject Phone, I identified the following files located in the Subject Phone's "Photo" application and which, based on a manual preview by HSI Special Agent 1, were saved or created on or before June 17, 2026, and constitute child pornography:

a. Image 1: This photo depicts an approximately 1-3 year old minor's anus being penetrated by the erect penis of an adult male. The manual preview indicated that the image was saved or created on May 11, 2026.

b. Video 1: This video is approximately 42 seconds in length. This video depicts a pre-pubescent child's mouth being penetrated by an erect penis.

The manual preview indicated that the image was saved or created on April 23, 2024.

c. Video 2: This video is approximately 1 minute and 55 seconds in length. This video depicts an approximately 2-4 year old male being anally and orally penetrated by an adult male's erect penis. The manual preview indicated that the image was saved or created on March 21, 2023.

27. In addition to the child pornography within the Subject Phone, I identified numerous indicators that NEAL is the user of and possessed the Subject Phone, including:

a. The Apple iCloud name at the top of the Subject Phone is "Thomas Neal";

b. The Subject Phone's name, under the Settings application, is listed as "Thomas's iPhone (2)";

c. The phone number associated with the Subject Phone is [REDACTED] 2063. According to NEAL's statements made to HSI Agent 1, that is Neal's telephone number.

28. Based on a review of the National Center for Missing and Exploited Children (NCMEC) database records, identified a CyberTip from approximately April 2023, in which Individual A, who identified himself as a former romantic partner of NEAL's, reported that NEAL kept a two-terabyte hard drive of child pornography with him on a regular basis. Individual A stated that he also reported NEAL to High

School A.³ The email address thomas.j.neal@[XXX].com⁴ was included as an identifier for NEAL in this report.

29. Additionally, according to NCMEC database records, a report submitted on or about May 17, 2025 by Snap, Inc. reported that Snapchat username “polyglot03” uploaded two files of apparent child pornography, identified by NCMEC as media uploaded to Snapchat in chat from the user’s device. An email associated with the Snap account “polyglot03” was thomas.j.neal@[XXX].com.

30. According to Passenger Name Record System maintained by CBP, the email address thomas.j.neal@[XXX].com was used to book NEAL’s UA 359 flight from ORD to MEX on June 17, 2026.

³ Based on the High School A’s website and a LinkedIn Account for NEAL, he is currently employed as a teacher at High School A, located in the Northern District of Illinois. According to a social media post made by High School A, NEAL was employed by High School A as early as 2017.

⁴ The email domain name has been redacted.

E. CONCLUSION

31. Based on the above information, there is probable cause to believe that NEAL knowingly transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), on the Subject Phone, in or affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(1).

FURTHER AFFIANT SAYETH NOT.

Tracy Altman by GAF

TRACY ALTMAN
Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone June 24, 2026.

Gabriel A. Fuentes

Honorable GABRIEL A. FUENTES
United States Magistrate Judge