

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RONALD FEDER

CASE NUMBER:

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

COUNT ONE

On or about November 29, 2017, at Skokie, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2252A(a)(1)	knowingly transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a video file entitled "Tara and Dad," using a means and facility of interstate commerce, and in and affecting interstate commerce by any means, including by computer.

COUNT TWO

On or about December 7, 2017, at Lincolnwood, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2252A(a)(2)(B)	knowingly distributed any material, namely, a 16 gigabyte Silver Sony USB 3.0 thumb drive, that contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

NATHAN A. CRAVATTA
Special Agent, Homeland Security Investigations
(HSI)

Sworn to before me and signed in my presence.

Date: December 8, 2017

Judge's signature

City and state: Chicago, Illinois

JEFFREY COLE, U.S. Magistrate Judge
Printed name and Title

AFFIDAVIT

I, NATHAN A. CRAVATTA, being duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), an investigative branch of the United States Department of Homeland Security. I have been employed as a Special Agent with HSI since May 2005 and am currently assigned to the Resident Agent in Charge Office in Milwaukee, Wisconsin.

2. My experience as an HSI agent has included the investigation of cases involving the use of computers and the Internet to commit violations of federal law involving child exploitation, including the production, transportation, receipt, distribution, and possession of child pornography. I have received training and have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, and the execution of searches and seizures involving computer crimes. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children, including violations of Title 18, United States Code, Sections 2252 and 2252A.

3. This affidavit is submitted in support of a criminal complaint alleging that RONALD FEDER has violated Title 18, United States Code, Sections 2252A(a)(1) and 2252A(a)(2)(B). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging FEDER with transportation of child pornography and distribution of

material containing 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.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and persons with knowledge regarding relevant facts.

FACTS SUPPORTING PROBABLE CAUSE

Introduction and Summary

5. On or about November 21, 2017, an undercover agent with the Wisconsin Department of Justice Division of Criminal Investigation (UC-1) posted an advertisement on Craigslist.com (“Craigslist”)¹ seeking individuals interested in discussing a “taboo request.” On or about November 26, 2017, an individual with the username “Jack Wayne” responded to UC-1’s post. “Jack Wayne” informed UC-1 that he (“Jack Wayne”) had a “collection” available to share and was interested in discussing same with UC-1 via the encrypted mobile chat application Wire Swiss GmbH (“Wire”).² After setting up a Wire user-account, UC-1 sent “Jack Wayne”

¹ Based on my training and experience, I know that Craigslist.com is a website that allows users to post classified advertisements or requests. Other users can read these advertisements/requests and communicate with the poster via private messages.

² Based on my training and experience, I know that “Wire” is a free chat application designed for mobile phones or other electronic devices which allows users to communicate via encrypted message. Communication with other Wire users typically requires a user to know the intended Wire recipient’s username. Once a user is located or identified, “Wire” users can make voice and video calls as well as send one another text messages, files, images, videos, and audio files.

UC-1's Wire username and was subsequently contacted on Wire by an individual with the name "Tom Bradly," whom UC-1 understood to be the same individual that UC-1 had communicated with on Craigslist (that is, "Jack Wayne").

6. Between November 26, 2017, and December 6, 2017, UC-1 and "Tom Bradly" communicated extensively over Wire. During those communications, as well multiple phone calls, "Tom Bradly"—who informed UC-1 that his actual name was "Ron"—provided UC-1 with a detailed account of his ("Tom Bradly's") interest in child pornography. In addition, FEDERER shared with UC-1 numerous images and videos containing child pornography, including a video titled "Tara and Dad." "Tom Bradly" further offered to trade child pornography with UC-1 in exchange for UC-1 coordinating a meeting at which "Tom Bradly" could molest UC-1's minor nephew and niece, and offered UC-1 advice on strategies for molesting children and for obtaining child pornography.

7. As detailed below, based on information provided by "Tom Bradly" during communications with UC-1, as well as IP information associated with the user of the "Jack Wayne" Craigslist account, law enforcement identified the individual with whom UC-1 was communicating as RONALD FEDER.

8. In accordance with plans made by FEDER and UC-1 over Wire and telephone conversations, on or about December 7, 2017, FEDER and UC-1 met at coffee shop in Lincolnwood, Illinois, at which time FEDER provided UC-1 with a thumb drive that contained child pornography.

9. Law enforcement has learned that on or about September 14, 2016, FEDER was indicted in the Northern District of Illinois for Possession of Child Pornography,³ which case is currently pending, and FEDER is on bond and being supervised by Pretrial Services. The criminal conduct underlying the present investigation involves actions performed by FEDER while on pre-trial release for this prior, unrelated charge.⁴

UC-1's Initial Craigslist Post and Communications with "Jack Wayne"

10. On or about November 21, 2017, UC-1 publicly posted an advertisement on Craigslist.com, in a section of the website entitled, "Taboo Request (Madison)." The body of UC-1's message read as follows: "I have a Taboo request but do not want to put in title or in post. I am seeking something that is not easy to talk about or ask just any random stranger. I am discrete and disease free and looking for serious inquires. Please respond with the most Taboo thing you would do or provide and I will respond if you email subject is what I am looking for. Not looking to judge or report anyone, just looking to use my money to get something I have been wanting to try." The advertisement indicated the poster was "35 years old, average build, 6'0", single and kids, want boy or girl."

11. On or about November 26, 2017, UC-1 received the following messages from Craigslist user "Jack Wayne." "I think we're on the same page here. If you have wire I can go into much more detail. Hmu [hit me up] and I think we can work

³ *United States v. Feder*, 16 CR 587 (N.D. IL) (Shah, J.).

⁴ Notably, the terms of FEDER's current pre-trial release prohibit him from using the internet.

something out . . . I have a collection I can send some to you over wire if you get it . . . Let me know your username when you get it setup.” Law enforcement noted that “Jack Wayne’s” contact email was listed on the Craigslist website as “ee9c31b3b3be30e1936d8b4b3568316a@reply.craigslist.org”

12. Later that day, and per “Jack Wayne’s” instructions, UC-1 established an account on the Wire secure messaging application and sent his profile information to the Craigslist user “Jack Wayne.” That same day, November 26, 2017, UC-1 received a message from a Wire user with the alias “Tom Bradly.”

UC-1 Communicated with “Tom Bradly” aka “Ron” on the Wire Application and in Phone Conversations

13. Between on or about November 26, 2017, and on or about December 6, 2017, UC-1 and “Tom Bradly” exchanged hundreds of messages on the Wire application and engaged in multiple phone calls. In particular, over the course of their communications, among other things, “Tom Bradly” shared multiple images and videos with UC-1 containing child pornography, provided UC-1 with details about “Tom Bradly’s” actual identity (including that “Tom Bradly’s” real name was “Ron”), detailed his preferences regarding child pornography, offered to provide UC-1 with child pornography in exchange for UC-1 arranging a meeting at which “Tom Bradly” could molest UC-1’s minor relatives, provided UC-1 with strategies for molesting children and acquiring child pornography, and coordinated a meeting for the purpose

of providing UC-1 with a thumb drive containing child pornography. These communications are excerpted and summarized in the following paragraphs.⁵

14. As shown in the below conversation excerpts, in their first Wire communications on or about November 26, 2017, “Tom Bradly” informed UC-1 of his preferences regarding child pornography (“3-4 through 12-14 and boys and girls”), provided UC-1 advice on how to obtain child pornography, offered to trade child pornography with UC-1 in exchange for UC-1 setting up a meeting at which “Tom Bradly” could molest UC-1’s 8-year-old niece and 10-year-old nephew, and sent UC-1 multiple images containing child pornography:

Sender	Date	Message
Tom Bradly	11/26/2017 6:40 PM	hey
UC-1	11/26/2017	Hey
Tom Bradly	11/26/2017	What types are you into?
UC1-1	11/26/2017	Im into anything under 8... I like a little older than that sometimes though. I like both boy and girls. You?
Tom Bradly	11/26/2017	About the same. 3-4 through 12-14 and boys and girls
Tom Bradly	11/26/2017 6:58 PM	Suspect sent image titled: Wire_1512088325983 [UC-1 described this image as a colored image of a prepubescent female lying on a tan blanket with pink flowers being masturbated by what appears to be the arms of another prepubescent female.]
UC-1	11/26/2017	Omg! Those are amazing!
Tom Bradly	11/26/2017 6:59 PM	Suspect sent image titled: Wire_1512088330724

⁵ My understanding of these Wire messages is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. As noted, only excerpted portions of the communication between “Tom Bradly” and UC-1 are contained herein. Reference is also made in this Affidavit to recorded telephone conversations, which have similarly been summarized and placed in context. The recorded conversations discussed herein do not represent finalized transcripts and may not represent the entire conversation that occurred between the identified individuals. In addition, all of the voice identifications herein are preliminary. In addition, only portions of the recorded conversations are contained herein.

		[UC-1 described this image as a colored image of two prepubescent females, one of whom appears to be touching her vagina with her right hand.]
Tom Bradly	11/26/2017 7:02 PM	Suspect sent image titled: Wire_1512088337477 [UC-1 described this image as a colored image of a prepubescent female lying on her back in a bathtub. The prepubescent female is completely nude and visible from the top of her head down to her knees.]
Tom Bradly	11/26/2017 7:02 PM	Suspect sent image titled: Wire_1512088340802 [UC-1 described this image as a colored image of a close up of two vaginas, one on top of the other. The top vagina has minimal pubic hair development and the bottom one appears to be prepubescent. The words "NLF No Limits Fun nolimitsfun@tormail.org" are printed in the lower right corner in white writing.]
Tom Bradly	11/26/2017 7:02 PM	Suspect sent image titled: Wire_1511744669564 [UC-1 described this image as a close-up of a prepubescent male's erect penis being inserted in what appears to be a prepubescent female's vagina. The prepubescent male's penis and testicles are visible. The prepubescent female's buttocks and anus are visible.]
UC-1	11/26/2017	I wish this stuff was easier to get. Someday it will be legal
Tom Bradly	11/26/2017	Hopefully!
Tom Bradly	11/26/2017	Its easy if you know where to look
Tom Bradly	11/26/2017	But we can talk about that another time. Maybe on the phone
Tom Bradly	11/26/2017	But I gotta get to dinner
UC-1	11/26/2017	Sweet! I would definitely like to know where I can get more awesome pics like these
Tom Bradly	11/26/2017	Darkweb. But itll be easier to discuss on the phone
UC-1	11/26/2017	Those the best ones you have?
Tom Bradly	11/26/2017	I have so many its hard to say
Tom Bradly	11/26/2017 10:36 PM	Suspect sent image titled: Wire_1512089228752 [UC-1 described this image as a colored image of a prepubescent female standing in what appears to be a river. The prepubescent female's entire body is visible. The prepubescent female is not wearing underwear and her vagina is visible. The prepubescent female appears to be urinating and is looking down toward the water.]
Tom Bradly	11/26/17 10:36 PM	Suspect sent image titled: Wire_1512089233808 [UC-1 describes the image as a colored image of a close up of an adult male laying on his back with a prepubescent female straddling his face. The prepubescent female is completely nude and her vagina is visible. The adult male is inserting his tongue into the prepubescent female's vagina.]

Tom Bradly	11/26/2017	You have any kids yet?
UC-1	11/26/2017	That one's my favorite!
Tom Bradly	11/26/2017	Last?
UC-1	11/26/2017	Just nieces and nephews
Tom Bradly	11/26/2017	Nice...play with them?
UC-1	11/26/2017	No. Don't want to do that with a kid I know. That one is hot too!
Tom Bradly	11/26/2017	I wish I knew a kid I could lend you
UC-1	11/26/2017	I do too...
Tom Bradly	11/26/2017	Maybe I could play with you nieces and nephews and you could watch
UC-1	11/26/2017	Would you be into that? I could maybe set that up...
Tom Bradly	11/26/2017	Omg id totally be into that
Tom Bradly	11/26/2017	You serious?
UC-1	11/26/2017	Are you?
Tom Bradly	11/26/2017	Yes very much so
UC-1	11/26/2017	That would take some planning... you in Madison area?
Tom Bradly	11/26/2017	Chicago
Tom Bradly	11/26/2017	I don't have a car though. Could you head this way?
Tom Bradly	11/26/2017	I mean this will be in the future...no need to rush this
UC-1	11/26/2017	We could work something out. What you thinking for terms?
Tom Bradly	11/26/2017	Like money? Or I could make a copy of the 60-80gb of videos and pics I have
Tom Bradly	11/26/2017	Just for an hour or so over the weekend
Tom Bradly	11/26/2017	Maybe two hours
UC-1	11/26/2017	Let me think on that. I would have to come up with a reason to bring one of them down there. Easier if you could get this way
UC-1	11/26/2017	I have a 8yr old niece and 10yr old nephew. I don't really have any pics of them. I could try and get some
Tom Bradly	11/26/2017	That would be amazing!! Which one do you thin[k] would be more into it?
UC-1	11/26/2017	Not sure... Probably niece
Tom Bradly	11/26/2017	Yay!
UC-1	11/26/2017	If the stuff you have all stuff you got on dark web?
Tom Bradly	11/26/2017	Yup sadly. A few things I have from other but some of which are private. Pics of their nieces and nephews.
Tom Bradly	11/26/2017	The rest are pics of used panties of their daughters and nieces
UC-1	11/26/2017	Nice! That's pretty sweet you have hook ups like that
Tom Bradly	11/26/2017	Im meeting a guy soon whom ive met before to swap vids and jo. Hes bringing over a pair of used panties from his 9yo cousin
Tom Bradly	11/26/2017 11:07 PM	<i>Suspect sent image titled: Wire_1512089260037</i> [UC-1 described this image as a colored image of two prepubescent males. The prepubescent male on the right has the prepubescent male on the left's penis inserted in his mouth and appears to be performing oral sex.]
Tom Bradly	11/26/2017	Exactly
Tom Bradly	11/26/2017	Which is why I love chatting on the phone
UC-1	11/26/2017	Damn!
Tom Bradly	11/26/2017	Yup imagine that's me and your nephew

15. As detailed in the below conversation excerpts, in their Wire communications on November 27, 2017, “Tom Bradly” informed UC-1 that he worked at a grocery-store at the deli and BBQ counter, discussed plans and strategies for molesting UC-1’s minor relatives, and sent UC-1 images containing child pornography:

Sender	Date	Message
UC-1	11/27/2017	What do you do?
Tom Bradly	11/27/2017	Grocery store...I work in deli
UC-1	11/27/2017	Nice! You always work in deli?
Tom Bradly	11/27/2017	I bounce around
Tom Bradly	11/27/2017	I get to enjoy sooo many girls walking around in tight yoga pants. I can see the outline of thei panties and on one girl the pants were almost sheer. I could see the fruit shapes on the light blue panties
UC-1	11/27/2017	That sounds awesome! I love girls in yoga pants! Usually only older girls wear them tho. How old was she?
Tom Bradly	11/27/2017	Looked about 11-12
Tom Bradly	11/27/2017 7:13 PM	<i>Suspect sent image titled: Wire_1512089237929</i> [UC-1 described this image as a colored image of a close up of a prepubescent female’s vagina.]
Tom Bradly	11/27/2017	Cant wait to see a pic of you niece and nephew
UC-1	11/27/2017	I volunteered 2 babysit so their parents can go xmas shopping
Tom Bradly	11/27/2017	Yay
Tom Bradly	11/27/2017	When are they going shopping?
UC-1	11/27/2017	I was trying to find a way to get them for a longer period if I have to come down there and I also worry about them saying we are heading down to Chicago by you... Would you consider taking the train up here to Columbus? It runs from Columbus down to Chicago. If you came up here, I could score you some more time for you to have with them... just thinking of some ideas
Tom Bradly	11/27/2017	Omg I totally would! I work two jobs and don’t have enough time off
Tom Bradly	11/27/2017	I wish I could afford to quit a job. I totally would
Tom Bradly	11/27/2017	We could video chat here. Not sure what we could do. I might be able to just chat with her. Get her horny. Watch her masturbate. You could watch also. But I just don’t have the time.
UC-1	11/27/2017	Oh ok. Thought you were available on Saturdays. Just trying to figure out a plan. If all else fails I could try to work out coming there, just hard to bring them
Tom Bradly	11/27/2017	Say it’s a field trip
Tom Bradly	11/27/2017	Lots to see in Chicago. On Saturdays, its my only time to do anything so I have all my appts then.
UC-1	11/27/2017	So Saturdays are good or aren’t good for you?
Tom Bradly	11/27/2017	Theyre good but only for an hour or two

UC-1	11/27/2017	Ok. Ill let you know what weekend they ask me to babysit. It will be one of these before Xmas if that's what you want. Otherwise we could just meet up. Whatever you are feeling.
Tom Bradly	11/27/2017	Anyway we can meet then you can bring them?
UC-1	11/27/2017	Like we meet once and bring one or both of them another time?
Tom Bradly	11/27/2017	We can do that
Tom Bradly	11/27/2017	We also have to talk about how to best convince her or them to get naked
UC-1	11/27/2017	Yeah for sure. You able to meet half way somewhere? I could pay for a hotel or something?
Tom Bradly	11/27/2017	Theres no one there to cover me. Im kinda the only one trained on my main station.
Tom Bradly	11/27/2017	I run the BBQ station also. Only 3 people can run it
UC-1`	11/27/2017	Bbq at your grocery store?
Tom Bradly	11/27/2017	Yup
Tom Bradly	11/27/2017	Do you think your niece or nephew would be helped into getting horny by seeing some of the pics I sent you? Maybe to compare them to the pics... might be a way we can get them naked.
Tom Bradly	11/27/2017 9:40 PM	<i>Suspect sent image titled: Wire_1512100237013</i> [UC-1 described this image as a colored image of a completely nude prepubescent male laying on his back on what appears to be a bathroom floor. The prepubescent male is visible from his thighs up to the top of his head. The male's nude erect penis and testicle are visible in the image.]
Tom Bradly	11/27/2017 9:40 PM	<i>Suspect sent image titled: Wire_1512100242667</i> [UC-1 described this image as a colored image of a nude erect prepubescent male's penis. The prepubescent male is visible from his thighs to his belly button. The prepubescent male's erect penis and testicles are visible in the image.]

16. As detailed in the below conversation excerpts, in their Wire communications on or about November 28, 2017, "Tom Bradly" discussed plans and strategies for molesting UC-1's minor relatives, requested images of said minor relatives, discussed the size of his collection of child pornography (indicating that he has 70-80 gigabytes of child pornography), and sent UC-1 images containing child pornography:

Sender	Date	Message
Tom Bradly	11/28/2017	I have a vid of a 12yo laying on her back masterbating with a dildo. You have amazing audio of her wet pussy... and her breathing getting harder and harder till she starts moaning. Right before she has a powerful orgasm the man behind the camera takes over and fucks her with the dildo. She cries out as she cums
Tom Bradly	11/28/2017 8:44 AM	Suspect sent image titled: Wire_1512100247237 [UC-1 described this image as a colored image of a prepubescent female lying on her back on a blue blanket with white flowers. The prepubescent female's vagina is visible in the image. The prepubescent female is holding an orange dildo in her right hand and the dildo is inserted into her vagina.]
Tom Bradly	11/28/2017	Maybe your nephew would like that?
UC-1	11/28/2017	Yeah I could see if he's into that. The pic or the video?
Tom Bradly	11/28/2017 8:57 AM	Suspect sent image titled: Wire_1512100250965 [UC-1 described this image as a colored image of a close up of a nude erect penis inserted into what appears to be a nude prepubescent female's vagina.]
Tom Bradly	11/28/2017	Another 12yo creampie at the end
Tom Bradly	11/28/2017	Pic I cant send the vid.. to large
Tom Bradly	11/28/2017	You can tell both of them im a sex ed teacher...
Tom Bradly	11/28/2017	I have new vids just got. Of a guy having sex with a 12yo
UC-1	11/28/2017	Nice! How many vids you got?
Tom Bradly	11/28/2017	70-80gb
Tom Bradly	11/28/2017	Cant wait to see your niece and nephew
Tom Bradly	11/28/2017	Did you ever get a pic of them?
UC-1	11/28/2017	I don't have any. They are cute!
Tom Bradly	11/28/2017	Could you get a pic of them?
Tom Bradly	11/28/2017 8:00 PM	Suspect sent image titled: Wire_1512100262662 [UC-1 described this image as a colored image of a nude prepubescent female lying on her back on the grass. The prepubescent female has her legs up in the air and spread apart. The prepubescent female's vagina is visible and there appears to be semen coming from her vagina and onto the ground.]

17. As detailed in the below, on or about November 29, 2017, "Tom Bradly" sent via Wire to UC-1 a video titled "Tara and Dad," which depicted an adult male engaging in sexual intercourse with a prepubescent female. In addition, as set forth in the conversation excerpts, in their Wire communications on or about November 29,

2017, “Tom Bradly” suggested a meeting with UC-1 in the Skokie area so that he (“Tom Bradly”) could share said child pornography collection (noting that he (“Tom Bradly”) did not have a car readily available and lived in the Skokie/Lincolnwood area of Illinois), and described plans for molesting UC-1’s minor relatives.. “Tom Bradly” additionally informed UC-1 that “Tom Bradly’s” actual name was “Ron”:

Sender	Date and Time	Message
Tom Bradly	11/29/2017	When are you able to call? Would like to chat a bit about it on the phone
UC-1	11/29/2017	Me too man. Nights aren't the best for me. I can maybe tomorrow night. Tell my wife I'm running to the store or something. I cant wait to see what else you have when we meet up!
Tom Bradly	11/29/2017	So much... just 26gb in new material plus a bunch of old stuff. Haven't added it all up yet
Tom Bradly	11/29/2017	Bring your laptop and copy what you want. Or you can spot me the cost of a thumbdrive and ill have it copied already
UC-1	11/29/2017	I can chat on here for a little bit. How was work today?
Tom Bradly	11/29/2017	Fine. Its work. But I completely embarrassed a little boy today by saying hi. But his mom was saying later that he was listening tto every word I said. Was asking her mom if he was eating the part of the turkey slice I gave them the sample of
UC-1	11/29/2017	Nice! How old?
Tom Bradly	11/29/2017	Well asked his mom about what I was telling her about it. He looked to be about 4-5
Tom Bradly	11/29/2017	Adorable little 5yo asian boy
UC-1	11/29/2017	That's almost the perfect age! You into boys more than girls?
Tom Bradly	11/29/2017	Im into both. But boys I like to be betwen 5-12
Tom Bradly	11/29/2017	Girls can be any age
Tom Bradly	11/29/2017	<i>Suspect sent video titled: Tara and Dad</i> [UC-1 described this video as a seven minute and thirteen second (7:13) video showing a completely nude adult male having sexual intercourse with a completely nude prepubescent female and engaging in other sexual acts with the prepubescent female.]
Tom Bradly	11/29/2017	You wanna lick my fingers after theyre in your niece?
Tom Bradly	11/29/2017	There you go
Tom Bradly	11/29/2017	Her nickname in the video is tara. And shes over 18 now and her dad's in prison.
Tom Bradly	11/29/2017 8:39 PM	<i>Suspect sent image titled: Wire_1512100283182</i> [UC-1 described this image as a colored image of four separate images depicting nude prepubescent females.]
Tom Bradly	11/29/2017	Just for a quick meeting on a sat. I know a few private areas near my house that we could meet. I probably will have to borrow a

		family's car for the time we plan to meet. But they need it also so once we make plans I can set up the care thing and we can meet and jo to the vids
UC-1	11/29/2017	Ok. If I came down I could always get a hotel room or something too if that would be better. I could put it on my credit card my wife doesn't know about. Whatever you think. You said there were some down by you, right?
UC-1	11/29/2017	I could do it overnight and just checkout when we are done. Not sure what you have down there or what rates are
Tom Bradly	11/29/2017	Doubt they'd be less than 100 min
UC-1	11/29/2017	That's not terrible but those are almost Chicago rates... lol
Tom Bradly	11/29/2017	Yeah no need to spend that much. Unless your gonna do that anyways. Find anything near the Skokie/Lincolnwood border and I could make it
UC-1	11/29/2017	That walking distance for you or you thinking in my car?
Tom Bradly	11/29/2017	I have a bike but if I plan on cramming all my errands into that day I could get the car for a few hours
Tom Bradly	11/29/2017 9:23 PM	<i>Suspect sent video titled: 15yo Powerful Orgasm</i> [UC-1 described this video as a two minute fifty nine second (2:59) colored video depicting a male masturbating a prepubescent female]
Tom Bradly	11/29/2017	This is going to be sooo much fun. Glad we met
Tom Bradly	11/29/2017	Good night
UC-1	11/29/2017	I am too. You are the only one that didn't send me a bunch of shitty messages when I told them what I was looking for. My name is Dylan by the way. Cant wait to meet up! Good night!
Tom Bradly	11/29/2017	My names Ron.
UC-1	11/29/2017 9:51 PM	Later Ron

18. As detailed in the below conversation excerpts, in their Wire communications on or about December 1, 2017, "Tom Bradly" (aka "Ron") provided UC-1 with his phone number, and sent UC-1 an image containing child pornography:

Sender	Date	Message
Tom Bradly	12/01/2017	I can talk anytime before noon
UC-1	12/01/2017	Good to hear from you. Alright. I'm out in the field. I can let you know when I'm back at office to call. That vid of the orgasm girl was fucking hot! I couldn't make it to the end... lol!
Tom Bradly	12/01/2017	Itll be [number ending in 5817]. Text first
Tom Bradly	12/01/2017 11:58 AM	<i>Suspect sent image titled: Wire_1512153747699</i> [UC-1 described this image as a colored image of what appears to be a prepubescent female lying on her back with an adult male's hand inserting the tan dildo into the prepubescent female's vagina.]

19. On or about December 2, 2017, at approximately 9:49 a.m., UC-1 placed a call to the 5817 number provided by “Tom Bradly” (aka “Ron”).⁶ UC-1 began the conversation by asking, “Hey is this Ron?,” to which “Ron” responded, “Yes, hi.” UC-1 then thanked “Ron” for sending him pictures and videos and asked how “Ron” found them. “Ron” told UC-1, “I could always teach you.” “Ron” then described his methods for finding child pornography on the internet. After several minutes, “Ron” told UC-1 that “Ron” had to briefly disconnect.

20. At approximately 10:10 a.m., UC-1 called “Ron” again. During the conversation, “Ron” suggested methods by which UC-1 could convince UC-1’s eight-year-old niece to allow “Ron” to molest her, including by showing UC-1’s niece some of the child pornography that “Ron” had sent to UC-1. “Ron” also again requested that UC-1 send “Ron” a picture of UC-1’s niece. “Ron” also asked UC-1 to “snag a pair of her panties.”

21. As detailed in the below conversation excerpts, in Wire communications on or about December 4, 2017, and December 5, 2017, “Tom Bradly” made plans to meet with UC-1 on Thursday, December 7, 2017, and to provide UC-1 with 16 gigabytes of child pornography in exchange for UC-1’s minor niece’s panties:

Sender	Date and Time	Message
Tom Bradly	12/04/2017	If I put the pics/vids on a SD card would that work also? I should be able to scrounge one of those up
UC-1	12/04/2017 5:15 PM	Het. An SD card sounds great!
Tom Bradly	12/05/2017	Ok cool.
Tom Bradly	12/05/2017 11:19 AM	I found a usb drive. 16gb ill try to get as much on as I can.

⁶ All calls between UC-1 and “Ron” were recorded by UC-1.

UC-1	12/05/2017	Thursday then?
Tom Bradley	12/05/2017	[Address of coffee shop in Lincolnwood, Illinois]
Tom Bradley	12/05/2017	Yup thu
Tom Bradley	12/05/2017	Make sure to wrap the panties in a paper bag or something

22. On or about December 6, 2017, at approximately 11:22 a.m., UC-1 placed a call to “Ron.” During the call, “Ron” provided UC-1 with detailed instructions for locating child pornography on the internet. UC-1 and “Ron” additionally discussed plans to meet at a coffee shop in Lincolnwood, Illinois at 3:00 p.m. the next day, December 7, 2017, so that “Ron” could provide UC-1 with a thumb drive containing child pornography from “Ron’s” collection.

Identification of Ron FEDER

23. On or about November 27, 2017, the State of Wisconsin-Office of the Attorney General issued an administrative subpoena to Craigslist requesting records related to Craigslist email address ee9c31b3b3be30e1936d8b4b3568316a@reply.craigslist.org, which email, as previously noted, was publicly displayed on the Craigslist website as the contact email for Craigslist user “Jack Wayne”(aka “Tom Bradley” aka “Ron”). Later that day, Craigslist provided information indicating that an additional email address associated with that user’s Craigslist account was “jwayne2345@gmail.com.”

24. Subsequently, that same day, on or about November 27, 2017, a State of Wisconsin-Office of the Attorney General administrative subpoena was issued to Google, Inc. requesting records related to the email address “jwayne2345@gmail.com.” In response, Google, Inc. provided records indicating, among other things, that the last login into that particular account occurred on

September 13, 2017 from IP address 207.229.137.74⁷ and that said IP was affiliated with Internet Service Provider RCN Corporation. Google further identified a telephone number ending in 7922 as affiliated with the “jwayne2345” Gmail address.

25. On or about December 1, 2017, law enforcement conducted a public-source Facebook mobile application search for the 7922 phone number and found that the number was associated with a Facebook user with the screen name “Ronald Feder.”

26. Additionally, based on information provided by “Ron” during the Wire communications—namely, that “Ron” worked at a grocery store with both a deli and BBQ, lived in the Skokie/Lincolnwood area, and did not have regular access to a car—law enforcement identified a particular grocery store in the Skokie/Lincolnwood area as “Ron’s” likely employer. On or about December 2, 2017, at approximately 5:50 p.m., surveillance was conducted at that grocery store, during which law enforcement located an employee wearing a nametag with “Ronald” working in the BBQ section of the store. A search of law enforcement databases revealed an Illinois driver’s license for an individual named “Ronald Feder” who appeared, based on the driver’s license photograph, to be the same individual spotted during surveillance, as well as the

⁷ Based on my training and experience, I know Internet Protocol (“IP”) addresses facilitate transfer of data over the Internet. An IP address is unique to a particular subscriber during an online session. The IP address provides a unique locator, making it possible for data to be transferred between computers. Each time an individual accesses the Internet, the computer from which that individual initiates access is assigned an IP address. Internet Service Providers typically retain records identifying the subscriber to whom a particular IP address was assigned. These records allow investigators to identify the subscriber account to which data is sent, or from which data is received.

individual located via the Facebook search (based upon law enforcement's review of photographs on "Ronald Feder's Facebook account).

27. In response to a State of Wisconsin-Office of the Attorney General administrative subpoena requesting subscriber information related to the previously mentioned IP address 207.229.137.74, on or about December 5, 2017, RCN Corporation provided law enforcement with records indicating that that IP address was registered to an address located on the 7500 block of Kolmar Avenue, in Skokie, Illinois.

28. Further, a search with the Illinois Secretary of State revealed that RONALD FEDER, along with two other individuals, report their residence as the Kolmar Avenue address.

29. Moreover, as previously noted, on or about September 14, 2016, FEDER was indicted in the Northern District of Illinois for an unrelated charge of Possession of Child Pornography, which is currently pending. On or about September 20, 2016, FEDER was granted pre-trial release in that matter with conditions (including that FEDER not use the internet). FEDER's assigned U.S. Pretrial Services Officer confirmed for law enforcement that the Kolmar Avenue address is FEDER's known address, and that when the Pretrial Services last conducted a home visit at the Kolmar Avenue address on November 14, 2017, FEDER was present.

FEDER's December 7, 2017 Meeting with UC-1 and Subsequent Arrest

30. As previously noted, in both their Wire and telephone conversations, FEDER and UC-1 made plans to meet at a coffee shop in Lincolnwood, Illinois on

December 7, 2017 at 3:00 p.m., so that FEDER could provide UC-1 with a thumb drive containing child pornography.

31. At approximately 2:25 p.m., UC-1—who was equipped with covert audio/video recording devices—arrived at the coffee shop on West Touhy Avenue in Lincolnwood, Illinois. As he arrived, UC-1 sent FEDER a text message stating that UC-1 was a few minutes away from the coffee shop.

32. At approximately 3:09 p.m., UC-1 sent FEDER a text message asking when FEDER would arrive. At approximately 3:15 p.m., UC-1 received a text from FEDER's phone which read, "10min."

33. At approximately, 3:16 p.m., UC-1 sent FEDER a text message describing what UC-1 was wearing and where UC-1 was sitting in the coffee shop.

34. At approximately 3:26 p.m., law enforcement surveillance, who were familiar with FEDER's appearance after having viewed a driver's license photograph of FEDER, observed FEDER enter the coffee shop, order coffee at the counter, and then sit down at a table with UC-1.

35. As reported by UC-1, and corroborated by law enforcement surveillance, as FEDER sat down at the table, UC-1 asked him, "Ron?" and FEDER replied in the affirmative.⁸ FEDER then handed UC-1 a thumb-drive. UC-1 and FEDER then discussed plans for UC-1 to coordinate a meeting between FEDER and UC-1's minor relatives. FEDER then provided UC-1 with advice on locating and identifying child

⁸ Although law enforcement covertly audio/video recorded the meeting between UC-1 and FEDER, that audio/video recording has not yet been fully reviewed and transcribed.

pornography online and information on a website that contained tips molesting children.

36. At approximately 3:42 p.m., surveillance observed FEDER leave the coffee shop, at which time he was immediately arrested by law enforcement.

37. Following the arrest, law enforcement performed an initial review of the thumb drive provided to UC-1 by FEDER, identified as a 16 gigabyte Silver Sony USB 3.0 thumb drive, stamped "Made in China." Through this initial review, law enforcement observed images depicting child pornography contained on the thumb driver. For example, law enforcement found a video on the thumb drive titled, "2011 7yo private Niece Elly on Sofa Trying Penetration He Cums With Sound 20100719(003)." UC-1 described the video as showing a prepubescent female, with a bare vagina, lying on her back as an adult male partially penetrates her vagina, and then ejaculates near her vagina. In addition, law enforcement found another video on the thumb drive titled "20101008," which depicted an adult male digitally penetrating the vagina of a prepubescent female.

CONCLUSION

38. Based on the above information, there is probable cause to believe that on or about November 29, 2017, FEDER knowingly transported child pornography namely, a video file entitled "Tara and Dad," using a means and facility of interstate commerce by sending same video depicting child pornography to UC-1 via the Wire mobile application. There is further probable cause to believe that on or about December 7, 2017, FEDER knowingly distributed material containing child

pornography, namely, a 16 gigabyte Silver Sony USB 3.0 thumb drive manufactured in China, using any means or facility of interstate or foreign commerce by personally handing same thumb drive to UC-1.

FURTHER AFFIANT SAYETH NOT.

NATHAN A. CRAVATTA
Special Agent, Homeland Security
Investigations

SUBSCRIBED AND SWORN to before me on December 8, 2017.

JEFFREY COLE
United States Magistrate Judge