

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Mag. No. 15-3274

v.

: Hon. James B. Clark, III

CURTIS E. THOMPSON,
a/k/a "Frank Lucas,"
a/k/a "CT West"

: **CRIMINAL COMPLAINT**

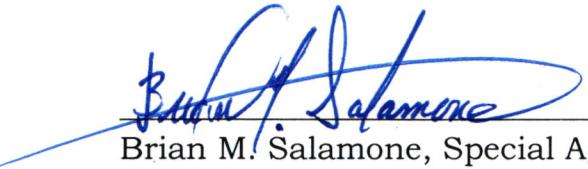
I, Special Agent Brian M. Salamone, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 page and made a part hereof.



Brian M. Salamone, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on November 6, 2015 at 4:20 pm

Essex County, New Jersey



HONORABLE JAMES B. CLARK, III
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count 1

In or around June 2015, in Essex and Mercer Counties, in the District of New Jersey, and elsewhere, defendant

**Curtis E. Thompson,
a/k/a “Frank Lucas,”
a/k/a “CT West”**

did knowingly employ, use, persuade, induce, entice and coerce a minor, “Minor Victim 1,” to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct; and did employ, use, persuade, induce, entice and coerce Minor Victim 1 to assist another person to take part in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing such visual depiction would be transported using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and 2.

Count 2

On or about June 17, 2015, in Essex and Mercer Counties, in the District of New Jersey, and elsewhere, defendant

**Curtis E. Thompson,
a/k/a “Frank Lucas,”
a/k/a “CT West”**

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

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), and 2.

ATTACHMENT B

I, Special Agent Brian M. Salamone, am a Special Agent with the Federal Bureau of Investigation ("FBI"). 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.

Background

1. At all times relevant to this Complaint:
 - a. Defendant Curtis E. Thompson (the "Defendant" or "Thompson") resided in or around Lawrenceville, New Jersey.
 - b. The Defendant had registered to him a 2010 Toyota Corolla automobile ("Thompson's Toyota Corolla").
 - c. "Minor Victim 1" was an individual who had not attained the age of 18.
 - d. MoneyGram was a payment transfer service, which enabled an individual in one location to wire money to a designated recipient in another location.
 - e. Facebook, Inc. provided a variety of social networking services to users, including a function through which Facebook users could "chat" with one another through their Facebook pages via instant messaging ("Facebook Chats"). Through Facebook Chats, users could send and receive photographs and videos.

Thompson Is the User of Facebook Account "Frank Lucas"

2. On or about August 5, 2009, an individual created a Facebook account under the name of "Frank Lucas" (the "Facebook Account").
3. As discussed in more detail below, that individual then used the Facebook Account to solicit a minor to send depictions of the minor engaging in sexually explicit conduct.
4. The investigation to date has shown that the user of the Facebook Account is the Defendant.

5. According to Facebook records, the individual who created the Facebook Account used the email address mrcurtisthompson@yahoo.com to sign up for the Facebook Account. That email address consists of the Defendant's first and last name.

6. On or about February 25, 2015, Thompson was arrested by the Lumberton Township Police Department ("Lumberton PD") and charged with endangering welfare of a minor, in violation of N.J.S.A. 2C:24-4 (the "State Charges"). According to the State Charges, Thompson enticed minors to engage in sexually explicit activity in his vehicle in exchange for Thompson providing gifts, usually sneakers, to the minors.

7. In connection with the State Charges, law enforcement officers executed a search warrant on Thompson's Toyota Corolla and took several photographs of the interior of Thompson's Toyota Corolla.

8. On or about June 17, 2015, the user of the Facebook Account sent a photograph to Minor Victim 1 which showed multiple \$10 and \$20 bills on top of a passenger seat of a car (the "June 17 Car Photograph"). Facebook Chat messages sent contemporaneously with the June 17 Car Photograph attempted to persuade Minor Victim 1 to send the user of the Facebook Account depictions of Minor Victim 1 engaging in sexually explicit conduct.

9. Law enforcement compared certain photographs of the interior of Thompson's Toyota Corolla to the June 17 Car Photograph. The photographs appear to depict the same vehicle.

10. The search of Thompson's Toyota Corolla revealed, among other things, Thompson's resume, which included the email address mrcurtisthompson@gmail.com – an email address strikingly similar to the mrcurtisthompson@yahoo.com email address that was used to register for the Facebook Account.

11. As discussed below, the user of the Facebook Account used MoneyGram to send payments to Minor Victim 1. In making those payments, the individual used the "sending consumer" name "CT West" – CT being the initials for "Curtis Thompson." Law enforcement have obtained a list of all MoneyGram payments by "CT West" and obtained video surveillance footage from a retail location where the last such payment was made. (This payment appears to be unrelated to Minor Victim 1.) The surveillance footage reveals that the individual at the retail location on the date and at the time of the payment appears to be the Defendant.

12. In addition, the search of Thompson's Toyota Corolla also revealed approximately two receipts for MoneyGram payments, this time with the sender name "Curtis Thompson."

13. The investigation revealed that, in addition to the promise of payments via MoneyGram, the user of the Facebook Account attempted to

persuade Minor Victim 1 to create visual depictions of minors engaged in sexually explicit conduct by offering to give Minor Victim 1 sneakers. As noted above, according to the State Charges, Thompson enticed minors to engage in sexually explicit conduct in his vehicle by promising them sneakers. Moreover, during the execution of the search warrant of Thompson's Toyota Corolla, law enforcement recovered approximately two pairs of new sneakers. Also, Thompson was once employed at a national footwear chain.

14. Finally, internet protocol ("IP") login records reflect that the user of the Facebook Account on several occasions logged onto the Facebook Account from the Defendant's apartment complex.

Thompson Uses the Facebook Account to Solicit Videos of Minors Engaged in Sexually Explicit Conduct

15. In or around April 2015, Thompson used the Facebook Account to become "friends" with Minor Victim 1.

16. On or about June 11, 2015, Minor Victim 1 told Thompson, in sum and substance, that Minor Victim 1 was under the age of eighteen.

17. Subsequent to June 11, 2015, Thompson used the Facebook Account to, among other things:

- a. Solicit and persuade Minor Victim 1 to record and send to Thompson videos of Minor Victim 1 and others engaging in sexually explicit conduct, including but not limited to acts of oral sex;
- b. Solicit and persuade Minor Victim 1 to engage in sexually explicit conduct and allow Thompson to watch this activity in real time through a video streaming service; and
- c. Request additional videos of Minor Victim 1 and others engaged in sexually explicit conduct in exchange for payments from Thompson wired via MoneyGram to Minor Victim 1 and others.

Thompson Offers to Pay, and Does Pay, for Videos Depicting Minors Engaged in Sexually Explicit Conduct

18. Between on or about June 10, 2015 and on or about July 19, 2015, Thompson and Minor Victim 1 negotiated the amount of payment for videos depicting Minor Victim 1 and others engaging in sexually explicit conduct.

19. On or about June 17, 2015, Thompson received, via the Facebook Account and other means, videos depicting minors engaged in sexually explicit conduct.

20. On or about June 11, 2015, June 12, 2015, and June 17, 2015, Thompson sent payments to Minor Victim 1 and others via MoneyGram.

21. Based upon my education, training and experience, my discussions with other law enforcement officers, and my review of Facebook and other records, the videos and other visual depictions 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.