
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 16-1502
 :
 v. : HON. DOUGLAS E. ARPERT
 :
 CHRISTOPHER WALSH : **CRIMINAL COMPLAINT**

I, Nicholas L. Tranchitella, being duly sworn, state that 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.

Nicholas L. Tranchitella, Special Agent
Department of Homeland Security
Homeland Security Investigations

Special Agent Nicholas L. Tranchitella attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A).

Sworn to before me and subscribed in my presence,
on March 10, 2016, in the District of New Jersey



HONORABLE DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One

On or about October 19, 2014, in Mercer County, in the District of New Jersey, and elsewhere, defendant

CHRISTOPHER WALSH

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

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

Count Two

On or about August 2, 2015, in Mercer County, in the District of New Jersey, and elsewhere, defendant

CHRISTOPHER WALSH

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

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

Count Three

On or about August 5, 2015, in Mercer County, in the District of New Jersey, and elsewhere, defendant

CHRISTOPHER WALSH

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

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

ATTACHMENT B

I, Nicholas L. Tranchitella, 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. 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.

1. Defendant CHRISTOPHER WALSH ("WALSH") is a resident of Yardville, New Jersey.

2. In or around November 2014, law enforcement discovered that an e-mail account with the user ID fatbusdriver0984 (the "E-Mail Account") had exchanged videos and images constituting child pornography with another e-mail address that was the subject of an investigation outside of New Jersey.

3. The subscriber of the E-Mail Account is listed as "Chris Walsh," and the subscriber name for the phone number associated with the E-Mail Account is also "Chris Walsh."

4. A search of the website Facebook.com revealed a profile for Chris WALSH, in which WALSH stated in publicly available postings that he is a bus driver for a bus company that provides school bus services ("Bus Company A"). A search of the New Jersey Department of Labor database revealed that WALSH was employed by Bus Company A from at least April through September 2015.

5. WALSH also stated on Facebook that during August and September 2015, he had been to at least seven camps or schools in New Jersey. WALSH's Facebook profile also includes, among other things, photographs depicting WALSH on school buses and photographs of a vehicle with a New Jersey license plate. That vehicle is registered to WALSH at an address in Yardville, New Jersey.

6. Based in part on the above information, law enforcement lawfully obtained e-mails sent and received by the E-Mail Account. Between on or about June 15, 2014 and on or about January 10, 2016, the E-Mail Account either sent or received a total of 1,590 files that contained content constituting child pornography, as defined in 18 U.S.C. § 2256(8)(A).

7. For example, without limitation, on or about October 19, 2014, an e-mail user identified as "Christopher Walsh" sent a message without a subject line from the E-Mail Account. Attached to the message were four still-image

photo files, titled "photo.JPG," "image.jpeg," "image.jpeg," and "image.jpeg." The text of the message read: "The first one is me. Second is a pic from the web. The last two are my sister and her daughter." The first file attachment, "photo.JPG," is a still image of an adult male engaged in anal sex with a prepubescent female. The child is naked from below the waist, with her legs lifted to expose her genitalia. The man's face is not visible.

8. Between on or about July 30, 2015 and on or about August 2, 2015, an e-mail user identified as "Chris" used the E-Mail Account to exchange e-mails with another e-mail user. "Chris" stated, in substance and in part, that he drives school buses and babysits at night, and that he likes "special kids." In response to a question from the other user, "Have you always liked younger girls or boys?", "Chris" responded, in substance and in part, "Yes, I've always liked them young."

9. "Chris" and the other user also discussed children that "Chris" stated he was babysitting; "Chris" stated, in substance and in part, "Boy is 2 girl is 9. I should be able to get some pics," and "I'm interested in them both. I'll have to test them to see if they are interested in playing." "Chris" stated, in substance and in part, that the girl "should be easy . . . because she has down's syndrome."

10. During this exchange, on or about August 2, the E-Mail Account sent the other user, among other things, an e-mail with a video file attached. The video depicts, among other things, a prepubescent female naked from the waist down, with her legs spread, exposing her vagina. The video depicts the child inserting her fingers into her vagina and then depicts an erect, adult penis entering the screen. The child performs oral sex on the penis, and then the adult male inserts both his penis and his fingers into the child's vagina.

11. On or about August 5, 2015, an e-mail user identified as "Chris" used the E-Mail Account to exchange e-mails with a different e-mail user. "Chris" attached multiple video files to e-mails sent to this other user, commenting, in substance and in part, "Here's one that I made," as to one video, and, "This girl was one that I met on a school trip one day," as to another. The first video depicts a prepubescent female engaging in anal sex with an adult male, while the second video depicts a prepubescent female masturbating an erect adult penis and performing oral sex upon the male.

12. WALSH also used the E-Mail Account to confirm details of his bus driving duties, including scheduling of a job at a particular school in New Jersey. In another exchange, the apparent office manager for Bus Company A requested confirmation that the e-mail address was correct for payroll purposes, asking, in substance and in part, for a response to include the recipient's first and last name. The E-Mail Account responded, in substance and in part, "Christopher Walsh."

13. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described in paragraphs 7, 10, and 11 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 sent via the Internet, based upon, among other things, their presence as attachments to e-mails sent by the E-Mail Account.