
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Douglas E. Arpert
v. : Mag. No. 18-5013 (TJB)
FRANK WILLIAM MAILE : **CRIMINAL COMPLAINT**


I, Anthony D. Jones, 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 of the United States
Department of Homeland Security, Homeland Security Investigations, and that
this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



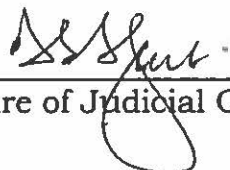
Anthony D. Jones, Special Agent
U.S. Department of Homeland
Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

May 2, 2018 _____ at
Date

Trenton, New Jersey _____
City and State

Honorable Douglas E. Arpert
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

On or about December 2, 2015 and December 3, 2015, in the District of New Jersey and elsewhere, the defendant,

FRANK WILLIAM MAILE,

outside of the United States, namely, in the Philippines, employed, used, persuaded, induced, enticed, and coerced a minor female to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purposes of producing a visual depiction of such conduct in video format, intending that the visual depiction be imported into the United States.

In violation of Title 18, United States Code, Section 2260(a).

ATTACHMENT B

I, Anthony D. Jones, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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.

1. Defendant Frank William Maile ("MAILE") is a pilot for one or more cargo flight companies. He is retired from the U.S. Air Force and holds several Federal Aviation Administration ("FAA") licenses. MAILE frequently travels abroad as a pilot, including to the Philippines.

2. MAILE resides in New Egypt, in Ocean County, New Jersey, at a residence he has owned since approximately 1994.

3. On or about April 6, 2018, MAILE reentered the United States from abroad, arriving in Huntsville, Alabama. Pursuant to the United States' border search authority, MAILE's electronic devices were manually searched. That search uncovered an image of child sexual abuse on a MacBook Pro in MAILE's possession. Law enforcement detained the MacBook Pro, as well as four other electronic devices (the "Detained Devices").

4. A forensic search of the Detained Devices has uncovered a large volume of apparently original depictions of child sexual abuse, both images and videos, involving several victims. Law enforcement has been able to link many of the victims to one or more social media accounts or otherwise to identify them.

5. For example, law enforcement has identified electronic chat communications between MAILE and an individual in the Philippines, A.I., who appears to be a pimp or arranger of sexual encounters with minors. Beginning in or around June 2013, MAILE and A.I. began discussing MAILE having sex with two minor sisters, Victim 1 and Victim 2. Based on the chats and other evidence, it appears that MAILE had sex with the older sister, Victim 1, on or about December 8, 2013.

6. MAILE was well aware that Victim 1 and Victim 2 were minors. During chat communications with A.I., MAILE repeatedly expressed an interest

in young girls, and A.I. told him in or around September 2014 that Victim 1 was 14 years old. In or around December 2014, MAILE suggested to A.I. that Victim 1 should take birth control pills, and A.I. responded that Victim 1 was too young. MAILE disagreed and noted that he did not want to get Victim 1 pregnant. MAILE also asked whether A.I. had a video of Victim 1 from when she was "young," by which he meant "when she was 10" years old. Additionally, A.I. told MAILE multiple times that Victim 1 was at school when MAILE asked where Victim 1 was.

7. During their chat communications, MAILE and A.I. repeatedly discussed whether particular hotels where MAILE stayed during his visits to the Philippines were "strict," meaning whether the hotels allowed minors to visit. During at least one chat, MAILE explained to A.I. that he would need to change hotels because the one he was at would not allow minors to visit.

8. Over the course of 2013, 2014, and 2015, MAILE continued to express an interest in having sex with Victim 2, the younger sister, and eventually expressed impatience with A.I.'s statements that Victim 2 was not ready to have sex with MAILE. In or around December 2014, MAILE chatted with A.I., who stated that Victim 2 was there with him. Victim 2 then apparently chatted with MAILE using A.I.'s login name. Victim 2 told MAILE that it was her 10th birthday that day.

9. Some of the chats described above between MAILE and A.I. took place while U.S. Customs and Border Patrol ("CBP") records indicate that MAILE was in the United States. Therefore, there is probable cause to believe that MAILE was at his residence, in Ocean County, New Jersey, while conducting some of the chats regarding engaging in sexual activity with Victim 1 and Victim 2.

10. According to CBP records, MAILE departed the United States on or about November 26, 2015.

11. On or about December 1, 2015, MAILE and A.I. chatted about setting up a meeting with MAILE, Victim 1, and Victim 2. MAILE suggested making a video of him having sex with Victim 1, which he told A.I. they could sell to make money. MAILE told A.I. that he would have to fix his camera first. In the course of this chat, MAILE told A.I. "i have now here [at the hotel] 12 year old girl." On or about December 2, 2015, MAILE told A.I. over chat that his video camera was fixed.

12. A forensic analysis of the MacBook Pro among the Detained Devices has revealed, among other things, numerous images and video files of

child sex abuse with file names that indicate they were taken on or about December 2, 2015 and/or December 3, 2015.

13. These images include, but are not limited to, multiple JPG files depicting naked prepubescent Asian females sitting on a bed with their genitals exposed and performing various sexual acts on each other. In addition, four short video files depict two naked prepubescent Asian females performing various sexual acts on each other, including one Asian female inserting her finger into the anus of the other.

14. Three video files depict a naked prepubescent Asian female lying on her back while another naked prepubescent Asian female is spreading open the genital area of the first Asian female.

15. Three additional short video files depict two naked prepubescent Asian females performing various sexual acts on each other, including one Asian female inserting a dildo into the vagina of the other. At one point, a hand of a white male is seen removing the dildo from her vagina. All of these files contain the same two Asian females.

16. Based on information from the Detained Devices and social media, I believe that the two prepubescent Asian females depicted in the images and videos described above are the sisters, Victim 1 and Victim 2.

17. The conclusion that the two prepubescent Asian females in the photos and videos detailed above are Victim 1 and Victim 2 is bolstered by a chat that MAILE and A.I. had in December 2015. While trying to convince A.I. that Victim 2 was ready to have sex with MAILE, MAILE stated that he had used a dildo to penetrate Victim 2 anally the last time they met. MAILE asked the price for having sex with Victim 2, and A.I. stated that he would ask Victim 2's mother.

18. According to CBP records, after taking pictures and creating the video recordings of child sex abuse noted above on or about December 2 and 3, 2015 in the Philippines, MAILE returned to the United States on or about December 27, 2015.