

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

WILLIAM H. NOBLE,  
a.k.a. "Bill"

Crim. No. \_\_\_\_\_

18 U.S.C. §§ 2252A(a)(2)(A), (a)(5)(A),  
(a)(5)(B), (b)(1), (b)(2), and  
18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting in Camden, charges:

COUNT 1

(Conspiracy to Receive and Distribute Child Pornography)

A. The Defendant and Other Individuals and Entities

1. At all times relevant to Count 1 of this Indictment:

a. Defendant WILLIAM H. NOBLE, a.k.a. "Bill," was an inmate at Federal Correctional Institution Fort Dix (hereafter "FCI Fort Dix") in Burlington County, in the District of New Jersey.

b. Charles Wesley Bush, who is named as a co-conspirator but not as a defendant herein, was an inmate at FCI Fort Dix.

c. Anthony C. Jeffries, who is named as a co-conspirator but not as a defendant herein, was an inmate at FCI Fort Dix.

d. Cooperating Defendant 1 (hereafter "CD-1") was an inmate at FCI Fort Dix who was cooperating with law enforcement.

e. FCI Fort Dix was a federal prison located on land and within buildings owned by, leased to, and otherwise used by and under the control of the United States Government. According to FCI Fort Dix's internal administrative regulations, the possession by an FCI Fort Dix

inmate of a portable telephone, pager, or other electronic device was a prohibited act at FCI Fort Dix.

B. The Conspiracy

2. From on or about November 1, 2016 to on or about April 26, 2017, in Burlington County, in the District of New Jersey, and elsewhere, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

did knowingly and intentionally conspire and agree with Charles Wesley Bush, Anthony C. Jeffries, and others, known and unknown, to receive and distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), 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, after having sustained a prior conviction under Chapter 110 of Title 18, United States Code.

3. It was the object of the conspiracy for defendant WILLIAM H. NOBLE, co-conspirators Charles Wesley Bush, Anthony C. Jeffries, and others, known and unknown, to access and download images and videos of child pornography from the Internet, while incarcerated in FCI Fort Dix, and to view and further disseminate these images and videos of child pornography while incarcerated in FCI Fort Dix.

C. Methods and Means of the Conspiracy

4. To further the conspiracy, defendant WILLIAM H. NOBLE, co-conspirators Charles Wesley Bush, Anthony C. Jeffries, and others, known and unknown, engaged in the following conduct:

a. Defendant WILLIAM H. NOBLE and co-conspirators Charles Wesley Bush and Anthony C. Jeffries obtained and unlawfully possessed contraband cellular telephones with Internet capability in FCI Fort Dix.

b. Defendant WILLIAM H. NOBLE and co-conspirators Charles Wesley Bush and Anthony C. Jeffries and CD-1 utilized the contraband cellular telephones to access, via the Internet, websites containing images and videos that depicted child pornography and downloaded child pornography from such websites.

c. Co-conspirator Anthony C. Jeffries assisted defendant WILLIAM H. NOBLE, co-conspirator Charles Wesley Bush, CD-1, and, and others, known and unknown, to access, via the Internet, images and videos that depicted child pornography, and to transfer these images and videos to other SD Cards for viewing and dissemination within FCI Fort Dix.

d. On a date occurring between on or about November 1, 2016 and on or about April 19, 2017, defendant WILLIAM H. NOBLE obtained a contraband cellular telephone and, with the assistance of co-conspirator Anthony C. Jeffries, used this cellular telephone to access, via the Internet, images and videos depicting child pornography, which defendant WILLIAM H. NOBLE downloaded onto a 16 gigabyte SanDisk SD Card (hereafter the "SanDisk SD Card").

e. On a date occurring between on or about November 1, 2016 and on or about April 19, 2017, defendant WILLIAM H. NOBLE, with the assistance of co-conspirator Anthony C. Jeffries, created a folder on the SanDisk SD Card bearing defendant WILLIAM H. NOBLE's initials "BN" in the file title of the folder and thereafter transferred into this folder images and videos containing child pornography.

f. On or about April 19, 2017, defendant WILLIAM H. NOBLE and co-conspirator Charles Wesley Bush entered into an agreement with CD-1 to transfer to CD-1, and

did transfer to CD-1, the SanDisk SD Card containing images and videos of child pornography, in exchange for compensation.

g. On or about April 19, 2017, co-conspirator Anthony C. Jeffries provided instructions to CD-1 explaining how CD-1 could transfer the contents of the SanDisk SD Card, including the child pornography contained within, to another SD Card based on the expressed understanding that CD-1 would in turn provide the contents of the SanDisk SD Card, including the child pornography contained within, back to defendant WILLIAM H. NOBLE.

h. In an effort to avoid detection, defendant WILLIAM H. NOBLE concealed and hid the SanDisk SD Card prior to providing it to CD-1.

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

COUNT 2

(Receipt of Child Pornography)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and re-alleged as if fully set forth in this Count.

2. On a date occurring between on or about November 1, 2016 and on or about April 19, 2017, in Burlington County, in the District of New Jersey, and elsewhere, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

did knowingly and intentionally receive and attempt to receive child pornography, as defined in Title 18, United States Code, Section 2256(8), 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, after having sustained a prior conviction under Chapter 110 of Title 18, United States Code.

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

COUNT 3

(Distribution of Child Pornography)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and re-alleged as if fully set forth in this Count.

2. On or about April 19, 2017, in Burlington County, in the District of New Jersey, and elsewhere, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

did knowingly and intentionally distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), 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, after having sustained a prior conviction under Chapter 110 of Title 18, United States Code.

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

COUNT 4

(Possession of Child Pornography)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and re-alleged as if fully set forth in this Count.

2. On or about April 19, 2017, in Burlington County, in the District of New Jersey, and elsewhere, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

did knowingly and intentionally possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), depicting prepubescent minors who had not attained 12 years of age, which images were mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, after having sustained a prior conviction under Chapter 110 of Title 18, United States Code.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) and Title 18, United States Code, Section 2.

COUNT 5

(Access with Intent to View Child Pornography on Federal Property)

1. Paragraphs 1 and 4 of Count 1 of this Indictment are hereby incorporated and re-alleged as if fully set forth in this Count.

2. On a date occurring between on or about November 1, 2016 and on or about April 19, 2017, in Burlington County, in the District of New Jersey, and elsewhere, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

in the special maritime and territorial jurisdiction of the United States, and on any land or building owned by, leased to, and otherwise used by and under the control of the United States Government, that is, FCI Fort Dix, did knowingly and intentionally access with intent to view material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), depicting a prepubescent minor who had not attained 12 years of age, after having sustained a prior conviction under Chapter 110 of Title 18, United States Code.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(A) and (b)(2) and Title 18, United States Code, Section 2.



FORFEITURE ALLEGATION

1. The allegations contained in Count 1 through Count 5 of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction for violating any of the offenses set forth in Count 1 through Count 5 of the Indictment, defendant

WILLIAM H. NOBLE,  
a.k.a. "Bill"

shall forfeit to the United States any and all matter that contains visual depictions of minors engaged in sexually explicit conduct in violation of the charged offense; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation or any property traceable to such property, including but not limited to the following:

- a. SanDisk 16 gigabyte SD Card, seized on or about April 19, 2017.

A TRUE BILL

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FOREPERSON

  
CRAIG CARPENITO  
United States Attorney