

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America )

v. )

ZACHARY WILLIAMS )

Case No. )

21-mj-2042 (AMD) )

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of October 2-4, 2020 in the county of Atlantic in the District of New Jersey, the defendant(s) violated:

Code Section Description of Offenses
18 U.S.C. Section 2423(b) See Attachment A

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

Bernadette Casey (handwritten signature)

Complainant's signature

Special Agent Bernadette Casey, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Date: 03/12/2021

Ann (handwritten signature)

Judge's signature

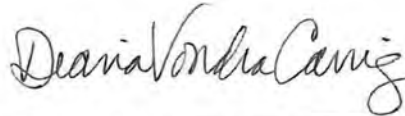
City and state: District of New Jersey

Hon. Ann Marie Donio, U.S. Magistrate Judge

Printed name and title

**CONTENTS APPROVED**

**UNITED STATES ATTORNEY**



By: \_\_\_\_\_  
DIANA VONDRA CARRIG  
Assistant U.S. Attorney

Date: March 12, 2021

**ATTACHMENT A**

**COUNT 1**

Between on or about October 2, 2020 through on or about October 4, 2020, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ZACHARY WILLIAMS

did travel in interstate commerce from New York to New Jersey for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 United States Code, Section 2246, with a person under the age of eighteen, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

In violation of Title 18, United States Code, Section 2423(b).

**ATTACHMENT B – AFFIDAVIT IN SUPPORT OF COMPLAINT**

1. I, Bernadette Casey, am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been employed by the Department of Justice for five years. Prior to becoming a Special Agent, I worked for the FBI as a Staff Operations Specialist for three years and an Operational Support Technician for one year. I have been a Special Agent for one year. My current assignment includes investigations relating to matters of violent crime against children with the FBI Newark Division – Atlantic City Resident Agency.
2. This Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of an arrest warrant and complaint charging defendant ZACHARY WILLIAMS (“WILLIAMS”) with traveling in interstate commerce with the intent to engage in illicit sexual conduct, in violation of Title 18, United States Code, Section 2423(b). Because this Affidavit is submitted for that limited purpose, I have not necessarily included each and every fact known to law enforcement concerning this investigation.
3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement and witnesses.
4. The statements set forth herein are being related in substance and in part, and particular dates set forth herein are alleged as taking place on or about the dates alleged. All times are approximate.
5. On December 8, 2020 detectives of the Galloway Township, New Jersey Police Department met with the parents of a ■-year old juvenile (“Victim 1”) regarding an incident in which WILLIAMS traveled to Seaview Marriot Resort in Galloway Township, New Jersey to have a sexual encounter with Victim 1. The parents of Victim 1 agreed to allow detectives to

interview Victim 1. During that interview, Victim 1 stated the following, in substance and in part:

- a. In or about September 2020, Victim 1 began communicating with an adult male (later identified as WILLIAMS) after he used the “quick add” feature on the social media site Snapchat.<sup>1</sup> WILLIAMS, while communicating in text via Snapchat, told Victim 1 that his name was “Zach” and he was seventeen-years old. Victim 1 informed “Zach” that she was [REDACTED]-years old.
- b. WILLIAMS communicated with Victim 1 through Snapchat for several weeks and asked Victim 1 to send nude photographs. WILLIAMS used various social media accounts to contact Victim 1 and asked for nude photographs. Victim 1 agreed and sent nude photos to WILLIAMS, but does not recall the number of nude photographs she sent.
- c. Victim 1 did not communicate with WILLIAMS via telephone calls or text messages, but rather only through social media applications.
- d. WILLIAMS asked Victim 1 to meet with him and threatened to release the nude photos if she did not comply. WILLIAMS advised Victim 1 that if she met with him, he would allow her to delete the nude photographs of herself from his phone.
- e. WILLIAMS reserved a room at the Seaview Hotel, A Dolce Hotel in Galloway Township, New Jersey.

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<sup>1</sup> Snapchat is an application used on smartphones, tablets, and computers for sending and receiving ‘self-destructing’ messages, pictures, and videos.

- f. According to Victim 1, on or around October 2, 2020, WILLIAMS travelled by bus from New York City, New York to Atlantic City, New Jersey to meet Victim 1. From the Atlantic City Bus Station, WILLIAMS took an “Uber”<sup>2</sup> to Seaview Marriot, A Dulce Hotel.
- g. On or about Sunday, October 4, 2020, Victim 1 met WILLIAMS at the Seaview Hotel, and went to his room – room 234 – where WILLIAMS engaged in unprotected sexual intercourse with her. Afterwards, WILLIAMS provided Victim 1 with an Emergency Contraceptive “Plan B” pill and made her take the pill in front of him. WILLIAMS then provided Victim 1 with his Apple iPhone cell phone and allowed her to delete all of the photos of herself.
- h. After Victim 1 had sex with WILLIAMS, WILLIAMS continued to send Victim 1 harassing messages from several different accounts on multiple social media platforms, including Snapchat and Instagram. For example, Victim 1 stated that she received a friend request on Snapchat from an account named: “IWILLHURTYOU Iwill\_h2021.” Victim 1 stated after she met with WILLIAMS, Victim 1 blocked WILLIAMS on Snapchat. Victim 1 then stated after Victim 1 blocked WILLIAMS’S Snapchat account he then contacted her through Instagram. WILLIAMS told Victim 1 that if Victim 1 did not add WILLIAMS back on Snapchat he would send her nude photographs to everyone.

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<sup>2</sup> Uber is a ride sharing application. As described herein, WILLIAMS is actually believed to have taken a Lyft – which is another ride sharing service – rather than an Uber from the Atlantic City bus station to the hotel.

6. The investigation has revealed that “Zach” is ZACHARY WILLIAMS, a 33-year old man, with a reported address in New York City, New York. Law enforcement officers from New York provided a New York driver’s license in ZACHARY WILLIAMS’S name. Victim 1 had a photograph of “Zach,” and law enforcement officers confirmed that the “Zach” from Victim 1’s photograph was the same individual as depicted in ZACHARY WILLIAMS’S driver’s license photo.
7. WILLIAMS used the snapchat handle z\_ff192 to communicate with Victim 1.
8. Pursuant to a subpoena, Snapchat provided subscriber information for z\_ff192 including a creation IP address of 2604:2000:F202:9b00:4473:28a:d1a2:e2f1.
9. On January 5, 2021, Galloway Township detectives served a subpoena to Charter Communications for the IP address associated with snapchat handle “z\_ff192.” Charter Communications provided a response including the following relevant identifying information:
  - a. Customer Name: Zachary Williams
  - b. Address: The same New York City, New York residence associated with WILLIAMS’S New York driver’s license
  - c. Email: Zachary.williams7557@gmail.com
10. On or about December 18, 2020, Galloway Township detectives also served a subpoena to Seaview, A Dolce Hotel, seeking records pertaining to the identity of the individual who rented room 234 during the time period from October 2, 2020-October 4, 2020. In response to the subpoena, Seaview, A Dolce hotel provided information showing that:
  - a. Room 234 was registered to Zachary Williams with a check-in date of October 2, 2020 and check out date of October 4, 2020.

- b. The guest declined to provide identification at the time of check-in because he claimed he had been recently robbed.
- c. The guest provided two credit card numbers that were used to pay for the room and incidentals. Seaview provided the last four numbers of both cards as: (1) 1740; and (2) 2001.
- d. The room was booked using a third-party vendor, Snaptravel.

11. On January 26, 2021, a Subpoena was issued to Snaptravel for information pertaining to the Mastercard credit card with the account number ending in 1740, used at Seaview, A Dolce Hotel, Galloway Township, New Jersey. Snaptravel provided the following reservation information used to book a room at Seaview Marriott with the Mastercard ending in 1740:

- a. Primary account holder: Zachary Williams
- b. Phone Number: \*\*\*-\*\*\*-0423 (hereinafter, the “0423 Cell Phone”)
- c. Email: Zachary.williams7557@gmail.com

12. On January 11, 2021, a subpoena was sent to Bancorp Bank for account information on the Mastercard account ending in 2001, the card used to pay for incidentals on Seaview Marriot room 234 in the amount of \$42.66. Bancorp provided the following account holder information:

- a. Account holder: Zachary Williams
- b. Address: \*\*\*\*\* New York, New York (a different address than that associated with WILLIAMS’S New York driver’s license)
- c. DOB: \*\*/\*\*/1987 (the same date of birth associated with WILLIAMS’S New York driver’s license)



13. In addition, Bancorp provided purchase information for the Mastercard ending in 2001, including:

- a. On October 3, 2020, a purchase was made using Mastercard account ending in 2001 to purchase a ride on the ridesharing app “Lyft” in the amount of \$4.61.
- b. On October 4, 2020, a debit in the amount of \$45.00 was made at Seaview, A Dolce resort.
- c. On October 5, 2020, a debit in the amount of \$3.15 was made for New Jersey Transit Bus-mytix.

14. On February 5, 2021 Galloway Township detectives received consent to do a consensual intercept of Victim 1’s social media accounts, which revealed the following information:

- a. On or about February 23, 2021, Victim 1 received an Instagram message from account name “uwantproblems783.” The individual messaged Victim 1 stating: “I’m sorry your getting exposed soon” “I didn’t want to do this to you.”
- b. On or about March 1, 2021, detectives conducted a consensual intercept and assumed the online identity and account of “Victim 1” and engaged in a group message with Z\_ILY21 and MS13ILY. The messages included, in substance and in part, the following conversation:
  - Victim 1: “ I don’t want to be in a gc<sup>3</sup>”
  - Z\_ILY21: “That’s my acct” “You should have added me then” “How come your not adding me”
  - Victim 1: “I did”
  - MS13ILY: “Can you add pedos and flirt with them, Tell me if any flirted or tried to seduce you like me”

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<sup>3</sup> Victim 1 stated that “gc” means group chat.

- Victim 1: “Can’t meet up Sunday. Going away with my parents. How bout the next Sunday”
- MS13ILY: “Okay, but I want you adding Pedos and I want a better ass pic”.
- Victim 1: “ U said yesterday we would meet up at the same place”
- MS13ILY: “I said yeah and now you just cancelled”
- Victim 1: “I’m sorry didn’t know I was going with my parents but can next weekend”
- MS13ILY: “It’s okay”
- Victim 1: “I don’t want to be exposed”
- MS13ILY: “That’s fine, I know you don’t. Aren’t you happy I almost did it and didn’t I just kept trying to make you come back for more pedo sex. I need to know who you were talking too, other boys? You know you’re a child molester cum dump right?”
- Victim 1: “I wasn’t talking to anyone cuz I didn’t have my phone. Like we talked about yesterday my mom keeps taking my phone.”
- MS13ILY: “All I want is to continue to be your child molestor”
- Victim 1: “ When r u going to come down then”
- MS13ILY: “I just said Sunday. No Changing it again, next that’s it.”
- Victim 1: “Okay”
- MS13ILY: “ Good baby, I want you adding pedos today okay”
- Victim 1: “The Marriott again”
- MS13ILY: “Yes”
- MS13ILY sent a picture of Victim 1’s buttocks which Victim 1 had previously sent to WILLIAMS.

15. On or about March 3, 2021, law enforcement officers obtained consent from Victim 1’s mother to conduct a forensic examination on the cellular telephone used by Victim 1. Law enforcement officers observed messages in the Instagram messaging application between Victim 1 and an account in the name of “Makeadealormomfindsout,” believed to be controlled by WILLIAMS. The messages included, in substance and in part, the following:

- Makeadealormomfindsout: “Your going to be angry crying and sad when I expose you”
- Victim 1: “Hey. I didn’t have my phone it was taken away because of grades”

- Makeadealormomfindsout: “Okay well I don’t know if I believe you anymore”
- Makeadealormomfindsout: “Because I’ve been close to exposing you”
- Makeadealormomfindsout: “So why the fuck did you block me”

16. On March 5, 2021, FBI agents received consent to assume the online identity for Victim 1’s social media accounts, and an FBI Agent assumed the online identity and account of “Victim 1” and engaged in a group message with Z\_ILY21 and MS13ILY. The messages included, in substance and in part, the following conversation:

- MS13ILY: “Helllooo”
- Victim 1: “Got into a fight wit my mom. I’m upset. I messaged you on ig4 ....you didn’t reply when I had my phone”
- MS13ILY: “Ohhhhh, only message my here and add this account”
- Victim 1: “Mom said I have to get rid of my apps so I’m gonna stay on ig for my friends”
- MS13ILY: Okay
- MS13ILY: I just wrote you on insta, now, “Iwillgettheswitchback”

17. The FBI Agent understood that WILLIAMS’S message, “I just wrote you on insta, now, ‘Iwillgettheswitchback,’” was intended as a demand that Victim 1 communicate with WILLIAMS via Instagram via WILLIAMS’S Instagram handle “Iwillgettheswitchback.” Accordingly, the FBI Agent switched communications from Snapchat to Instagram that same day, March 5, 2021, and engaged in the following communications with WILLIAMS using Victim 1’s Instagram account:

- IWILLGETTHESWITCHBACK: “Hey it’s me Zack
- VICTIM 1: “Came through now”
- IWILLGETTHESWITCHBACK: “Great are you ready to get molested still?”
- VICTIM 1: “ Are you going to touch me like last time?”

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<sup>4</sup> “IG” is a common abbreviation to mean Instagram, a social media account.

- IWILLGETTHESWITCHBACK: “ Yes Child molest you”
- VICTIM 1: “You’re the only one that likes my body
- IWILLGETTHESWITCHBACK: “Good more for me keep it that way”
- IWILLGETTHESWITCHBACK: “I have a fat cock that’s why
- IWILLGETTHESWITCHBACK:” A fat child molestor cock”
- IWILLGETTHESWITCHBACK: “ And you know it would make your mom mad”
- VICTIM 1: “That’s why it’s my secret”
- IWILLGETTHESWITCHBACK: “That you let a 33 year old boyfriend child molestor have his way with you and use it”
- IWILLGETTHESWITCHBACK: “She would be upset if she knew she was raising a pedophile cum dump”
- IWILLGETTHESWITCHBACK: “It’s the ultimate payback”
- VICTIM 1: “I feel like it’s been a long time since you had sex with me”
- IWILLGETTHESWITCHBACK: “It has been a very long time”
- VICTIM 1: “Why though”
- IWILLGETTHESWITCHBACK: “Because of you”
- VICTIM 1: “I thought of going on birth control”
- IWILLGETTHESWITCHBACK: “I wish, cheaper for me”
- VICTIM 1: “I read online there’s one you don’t get your period”
- IWILLGETTHESWITCHBACK: “And it’s better for your body”
- IWILLGETTHESWITCHBACK: “Do you miss having my cock”
- VICTIM 1: “I remember that day in the fall when we went to a hotel and saw it...was big”
- IWILLGETTHESWITCHBACK: “Did you love it?”
- IWILLGETTHESWITCHBACK: “You will take your child molestor cock and worship it”
- IWILLGETTHESWITCHBACK: “And can’t wait to child molest you”
- VICTIM 1: “I was thinking about my birthday today. I want COVID to be over so I can share my [REDACTED] birthday with all my friends and I’ll be older
- IWILLGETTHESWITCHBACK: “Awwwww, I love you. When is my baby’s bday”
- IWILLGETTHESWITCHBACK: “ What have you been thinking about, moving in with your pediphile”

18. During the course of assuming Victim 1's identity on Victim 1's social media accounts, law enforcement officers have been able to see various other Instagram handles that WILLIAMS has been following. Based upon postings from the accounts, several of these accounts appear to be held by other minor females.

19. On March 8, 2021, an FBI Agent assumed the online identity and account of "Victim 1" and engaged in a conversation with WILLIAMS via his Instagram account "IWILLGETTHESWITCHBACK." The messages included, in substance and in part, the following conversation:

- VICTIM 1: "I hope mom doesn't make me do much homework Friday. She said if I get everything done I can go over my friends while she's gone all day"
- IWILLGETTHESWITCHBACK: " So we are on for Sunday?"
- VICTIM 1: "Sunday?"
- IWILLGETTHESWITCHBACK: " Yeah" "This Sunday"
- VICTIM 1: " Oh Ok....maybe.... I can do my school work Friday then. If you're going to be nice to me"
- IWILLGETTHESWITCHBACK: "But didn't you already tell me to get the hotel for Saturday night and leave Sunday"
- IWILLGETTHESWITCHBACK: "At 12 pm"
- IWILLGETTHESWITCHBACK: "You come in the morning and fuck"

20. On March 9, 2021, an FBI Agent assumed the online identity and account of "Victim 1" and engaged in conversation with WILLIAMS via his Instagram account "IWILLGETTHESWITCHBACK." The messages included, in substance and in part, the following conversation:

- IWILLGETTHESWITCHBACK: "I only want to be your pedo"
- IWILLGETTHESWITCHBACK: "I like pretending you'll fuck other ones but I don't way you too"
- VICTIM 1: " Do you only want me though"
- IWILLGETTHESWITCHBACK: " I kinda do do you?"

- VICTIM 1: “But you think about other girls?”
- IWILLGETTHESWITCHBACK: “oh yes, I have an 11 year old my dick”
- IWILLGETTHESWITCHBACK: “Since you left me”
- VICTIM 1: “ Do you still see her?”
- VICTIM 1: “ I bet she isn’t as far away”
- IWILLGETTHESWITCHBACK: “She lives in CT”
- IWILLGETTHESWITCHBACK: “She farther I’ll show you the sex tape when I see you”
- IWILLGETTHESWITCHBACK: “Does that turn you on I drilled a 5<sup>th</sup> grader?”
- VICTIM 1: “I’m not sure I’d want to see. I don’t know.”
- IWILLGETTHESWITCHBACK: “Should make you really happy”
- VICTIM 1: “Is she on IG too”
- IWILLGETTHESWITCHBACK: “I’m not sure”
- IWILLGETTHESWITCHBACK: “That’s her”

WILLIAMS then sent the FBI Agent posing as VICTIM 1 a photograph of a young female with curly hair giving the “peace sign.”

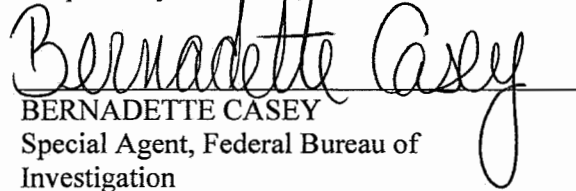
21. Open sources showed that the 0423 Cell Phone, which was listed as ZACHARY

WILLIAMS’S phone number on the subpoena return from Snaptravel, is serviced by Verizon Wireless. Law enforcement officers sent an administrative subpoena to Verizon Wireless requesting subscriber information and toll records for the 0423 Cell Phone. On March 5, 2021, Verizon Wireless responded to the subpoena with information showing that the listed subscriber is a reseller company: Charter Communications, LLC. An analysis of the toll records revealed:

- a. The 0423 Cell Phone was active as of March 4, 2021;
- b. There were no calls between the 0423 Cell Phone and Victim 1’s telephone. This is consistent with Victim 1’s statements that she has not spoken with “Zach” by phone.

- c. A phone call was made to Seaview Resort, A Dolce Hotel in Galloway Township, New Jersey on September 30, 2020, four days prior to WILLIAMS traveling to the hotel and engaging in sexual intercourse with Victim 1.
- d. Repeated calls to publicly listed numbers for Lucky's Famous Burgers, and Chelsea Square Restaurant, both of which have addresses on West 23rd Street, New York, New York, which is in close proximity to the New York, New York address associated with WILLIAMS'S New York driver's license and listed on the IP address return from Charter Communications.
- e. At least 5 calls to the publicly listed number for New York unemployment benefits. A law enforcement query with the New York State Department of Labor, reveals ZACHARY WILLIAMS is currently receiving unemployment benefits from the State of New York. Further, WILLIAMS listed the 0423 Cell Phone as his main contact for unemployment matters.

Respectfully submitted,

  
BERNADETTE CASEY  
Special Agent, Federal Bureau of  
Investigation

Pursuant to Fed. R. Crim. P. 4.1, FBI Special Agent Bernadette Casey was sworn and attested via telephone to the contents of this affidavit in support of the criminal complaint.



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HONORABLE ANN MARIE DONIO  
United States Magistrate Judge