
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor, U.S.M.J.
 :
 v. : Mag. No. 21-
 :
 ALEC M. DONOVAN : **CRIMINAL COMPLAINT**
 :
 :
 :


I, Brian 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.



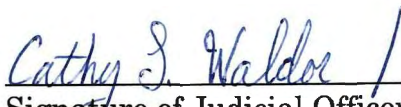

Brian Salamone, Special Agent
Federal Bureau of Investigation

Special Agent Salamone attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

August 3, 2021
Date

at New Jersey
State

Honorable Cathy L. Waldor
United States Magistrate Judge
Name and Title of Judicial Officer

 / 
Signature of Judicial Officer

ATTACHMENT A

(Distribution and Receipt of Child Pornography)

Between on or about January 17, 2021 and on or about March 20, 2021, in Ocean County, in the District of New Jersey, and elsewhere, defendant

ALEC M. DONOVAN

knowingly received and distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate and foreign commerce and 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).

ATTACHMENT B

I, Brian Salamone, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, 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. At all times relevant to this Complaint:

- a. Defendant Alec M. Donovan ("DONOVAN") was a resident of Brick, New Jersey.
- b. DONOVAN was a youth wrestling coach and referee.
- c. DONOVAN had multiple accounts with a web-based chatting or messaging service that also allowed users to exchange media, such as images or videos (referred to in this Complaint as "Application A").¹

2. On or about January 17, 2021, DONOVAN sent a video depicting child pornography to an Application A user ("Subject Video-1"). Subject Video-1 is approximately ten seconds long and depicts a pre-pubescent male child, approximately eight to ten-years-old, performing oral sex on an erect adult penis.

3. On or about January 17, 2021, DONOVAN received two videos depicting child pornography via Application A ("Subject Video-2" and "Subject Video-3"). Subject Video-2 is approximately 17 seconds long and depicts two nude males masturbating themselves and each other. One male is a pre-pubescent child, approximately twelve years old, and the other male appears to be a teenager. Subject Video-3 is approximately one minute and twenty-five seconds (1:25) long and depicts two male children, approximately thirteen years old, engaged in anal sex.

4. DONOVAN used the Internet Protocol ("IP") Address associated with his residence to exchange Subject Videos-1, 2, and 3 via Application A.

¹ The actual account name is known to law enforcement. But to protect the confidentiality and integrity of the ongoing investigation involved in this matter, the account name will be referred to as the "Donovan account."

5. On or about March 20, 2021, DONOVAN sent two videos depicting child pornography to an Application A user ("Subject Video-4" and "Subject Video-5"). Subject Video-4 is approximately two minutes and 25 seconds (2:25) long and depicts a pre-pubescent male child, approximately eight to ten-years-old, who is performing oral sex on a teenage male. Subject Video-5 is approximately 52 seconds long and depicts a pre-pubescent male child, approximately eight to ten-years-old, performing oral sex on an erect adult penis.

6. DONOVAN also used Application A to solicit and engage in conversations with minors, including requesting nude photographs from the minors and sending nude photographs to them.

7. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the videos described above were transported and transmitted in interstate commerce because they were transmitted by DONOVAN to Application A user, and vice-versa, who was located outside the District of New Jersey, and DONOVAN transmitted the videos via an Internet-based application.