

UNITED STATES DISTRICT COURT

for the
District of Delaware

United States of America

v.

LEE ROBERT MOORE

Case No. 15- 163M

Defendant

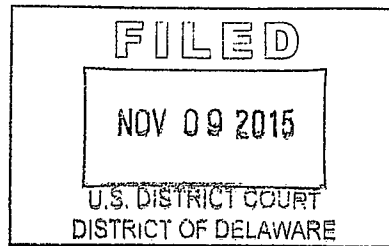
CRIMINAL COMPLAINT

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 of 11/09/2015 in the county of Sussex in the _____ District of
Delaware, the defendant violated 18 U. S. C. § 1470
, an offense described as follows:

Attempted Transfer of Obscene Material to a Minor

This criminal complaint is based on these facts:
See attached affidavit.



☒ Continued on the attached sheet.

Patrick M. McCall

Complainant's signature

Patrick M. McCall, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/09/2015

Christopher J. Burke

Judge's signature

City and state: Wilmington, Delaware

Hon. Christopher J. Burke, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEE ROBERT MOORE

Defendant.

Case No. 15-

163M

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Patrick M. McCall, being duly sworn, depose and state the following:

1. I am a Special Agent with Homeland Security Investigations ("HSI"), an investigative branch of the United States Department of Homeland Security. I am a federal law enforcement officer authorized by the Secretary of Homeland Security to request the issuance of search warrants. I have been employed as a Special Agent for ICE and its predecessor agency, the United States Immigration and Naturalization Service ("INS"), for approximately twenty-seven (27) years and am currently assigned to the Resident Agent in Charge Office in Wilmington, Delaware. I was previously assigned to the ICE/INS Philadelphia Office of Investigations for approximately eighteen years, where my responsibilities included conducting investigations into various types of federal crimes, including crimes involving child pornography. I have received training from ICE and another of its predecessor agencies, the United States Customs Service, regarding child pornography, the sexual abuse of children, the behavior of

preferential child molesters and how to conduct investigations of child sexual exploitation and obscenity crimes. As part of my work on these cases and in these training courses, I have observed and reviewed numerous examples of child pornography (as that term is defined in 18 U.S.C. § 2256) in all forms of media, including computer media. In the course of my investigative duties, I have also had contact, in the form of interviews and meetings, with preferential child pornographers and those involved in the distribution, sale, production and possession of child pornography. And I have assisted in the execution of numerous search warrants relating to investigations of child pornography crimes.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of a criminal complaint charging LEE ROBERT MOORE, age 37, of Church Hill, Maryland, with violating Title 18, United States Code, Section 1470, Transfer of Obscene Material to Minors.

4. For the reasons set forth below, I respectfully submit that this affidavit contains probable cause to believe that LEE ROBERT MOORE attempted to transfer obscene material – *i.e.*, a digital photograph of his exposed, erect penis – to a person he believed to be a 14-year-old female, via a social media application accessed from a mobile device.

5. The statements contained in this Affidavit are based on my experience and background as a Special Agent and on information provided by other law enforcement agents. I have not set forth every fact resulting from the investigation. Instead, I have included only that information necessary to establish probable cause to charge LEE ROBERT MOORE with

violating Title 18, United States Code, Section 1470 -- Transfer of Obscene Material to Minors.

STATUTORY AUTHORITY

7. This investigation concerns alleged violations of Title 18, United States Code, § 1470, relating to the transmission of obscene material to a minor. Section 1470 provides:

Whoever, using the mail or any facility or means of interstate or foreign commerce, knowingly transfers obscene matter to another individual who has not attained the age of 16 years, knowing that such other individual has not attained the age of 16 years, or attempts to do so, shall be fined under this title, imprisoned not more than 10 years, or both.

DETAILS OF INVESTIGATION

8. On or about August 24, 2015, a Delaware State Police Detective with the Delaware Child Predator Task Force (UC-1) was utilizing a created profile on the mobile-based, social media application "Meet24," which employs the tagline, "Feel the taste of love." This application geo-locates and identifies other app users who are in physical proximity, and provides a mobile-based platform for exchanging digital images, as well as voice and text messages. The application also notifies a user when other users view their profile.

9. UC-1's "Meet24" profile described UC-1 as a 14-year-old female from the Hazlett, Delaware area. UC-1 received a notification that a user "Rob" was viewing UC-1's profile and was subsequently contacted by a user with the screen name of "Rob." The "Meet24" profile of "Rob" listed him as a 30-year-old male from Starkey Corner, Maryland. UC-1 and "Rob" engaged in an online communication via "Meet24," during which UC-1 informed "Rob" that UC-1 lived with her Mom and was currently in school. During the chat, "Rob" asked what types of clothes UC-1 liked to wear. "Rob" also stated that he was chatting while he was taking a

shower and asked what UC-1 liked to wear to bed. “Rob” sent UC-1 a picture of a middle-aged male and stated it was a photo of himself. At the end of this chat session, UC-1 asked “Rob” if he wanted to chat on the social media application, “Kik,” which allows users to communicate online via a chat function and to exchange images and videos with other users. “Rob” agreed and provided his Kik profile of “Rob N/A.”

9. On or about August 25, 2015, Delaware Department of Justice subpoenas were issued to the Kik for subscriber information and internet protocol (IP) connection information for the Kik screen name “Rob N/A,” relating to the dates and times of the online communication with UC-1.

10. On or about August 26, 2015, Kik produced business records identifying the pertinent IP address as 72.28.250.206. Kik’s business records also listed the email address of trance5o@hotmail.com as registered to the Kik account of “Rob N/A.” A query of the American Registry for Internet Numbers (“ARIN”) online database revealed that IP address 72.28.250.206 was controlled by Internet Service Provider (ISP) Atlantic Broadband and was believed to be located near Stevensville, Maryland based on Maxmind geolocation of the IP address.

11. On or about August 26, 2015, a Delaware Department of Justice subpoena was issued to Atlantic Broadband for subscriber information relating to the use of the IP address 72.28.250.206 on the dates and times of the chat with UC-1 and “Rob N/A.” On or about September 21, 2015, Atlantic Broadband produced business records indicating that the IP address 72.28.250.206 was assigned at the pertinent date and times to the account of Lee Robert MOORE and Rebecca MOORE,

11, Maryland

12. On or about August 26, 2015, a Delaware Department of Justice subpoena was served on MSN for IP information on the Kik registration email address of trance5o@hotmail.com email. On September 9, 2015, MSN produced business records indicating that the email address trance5o@hotmail.com was accessed from the IP address 72 Pm 11/9/15 CTB 7.28.250.206. This IP address was identified as being assigned to Lee Robert MOORE and Rebecca MOORE, y!

13. On or about August 26, 2015, a Facebook profile associated with Lee Robert MOORE was identified (facebook.com/Rob.moore.7796). This profile indicated that Lee Robert MOORE was from Church Hill, Maryland and was married to Rebecca MOORE. This profile also contained photographs of a white male with two young children. The photographs contained on this Facebook profile appeared to match the photograph sent to UC-1 during the online chat session and those contained on the "Meet24" profile of "Rob."

14. On or about August 26, 2015, your affiant confirmed that Lee Robert MOORE was employed by the United States Secret Service-Uniformed Division and was currently assigned to The White House, in Washington, D.C.

15. On or about August 26, 2015, UC-1 was contacted via the Kik application by "Rob N/A." During this chat session, "Rob N/A" told UC-1 that he wanted to meet her in person and asked where she lived. UC-1 informed "Rob N/A" that she lived near the Dover Air Force Base. "Rob N/A" discussed meeting with UC-1 and subsequently requested that UC-1 wear a skirt when they met.

16. On or about August 31, 2015, at approximately 4:00 P.M., "Rob N/A" and UC-1

chatted via the Kik application. During this session "Rob N/A" initiated a conversation about sex and UC-1's prior sexual experiences. "Rob N/A" asked if UC-1 masturbated and stated that when they met that in person that he wanted to make UC-1 have several orgasms. "Rob N/A" further stated that he would like UC-1 to perform oral sex on him and in return he would perform oral sex on UC-1 and penetrate her digitally.

The following conversation ensued:

Rob N/A	May seem like a small thing in the grand scheme, but I would take immense pleasure in pulling those shorts off your hips and down your cute little legs	8/31/2015 8/31/2015 6:04:29 PM (UTC-4)
UC-1	Be exciting to try i mean id be nervous but still be fun. Just wouldn't want to bore u	8/31/2015 8/31/2015 6:05:31 PM (UTC-4)
Rob N/A	Oh I don't think you'd be boring	8/31/2015 8/31/2015 6:05:47 PM (UTC-4)
UC-1	Lol u say that. I hope not	8/31/2015 8/31/2015 6:06:06 PM (UTC-4)
Rob N/A	Have you done anything with boys beyond kissing?	8/31/2015 8/31/2015 6:06:20 PM (UTC-4)
UC-1	Yes but not as much as u i bet	8/31/2015 8/31/2015 6:06:56 PM (UTC-4)
Rob N/A	Tell me what you've done	8/31/2015 8/31/2015 6:07:11 PM (UTC-4)
UC-1	Blowjob	8/31/2015 8/31/2015 6:08:31 PM (UTC-4)
UC-1	Omg can't believe i told u that haha	8/31/2015 8/31/2015 6:08:50 PM (UTC-4)
Rob N/A	Nice	8/31/2015 8/31/2015 6:09:08 PM (UTC-4)
Rob N/A	Did you make him cum?	8/31/2015 8/31/2015 6:09:20 PM (UTC-4)
UC-1	Yes	8/31/2015 8/31/2015 6:09:34 PM (UTC-4)

4)

UC-1	What have u done haha	8/31/2015 8/31/2015 6:09:47 PM(UTC-4)
Rob N/A	Mostly with your hand or mouth?	8/31/2015 8/31/2015 6:09:53 PM(UTC-4)
Rob N/A	I've done pretty much everything	8/31/2015 8/31/2015 6:10:12 PM(UTC-4)
UC-1	Why I'd be nervous	8/31/2015 8/31/2015 6:10:41 PM(UTC-4)
Rob N/A	Did he go down on you? Or touch your pussy?	8/31/2015 8/31/2015 6:11:19 PM(UTC-4)
UC-1	Yes	8/31/2015 8/31/2015 6:11:31 PM(UTC-4)
Rob N/A	Did he make you cum?	8/31/2015 8/31/2015 6:11:43 PM(UTC-4)
UC-1	Do u like that	8/31/2015 8/31/2015 6:11:44 PM(UTC-4)
UC-1	No	8/31/2015 8/31/2015 6:11:53 PM(UTC-4)
Rob N/A	I will	8/31/2015 8/31/2015 6:12:00 PM(UTC-4)
UC-1	What	8/31/2015 8/31/2015 6:12:10 PM(UTC-4)
Rob N/A	I will definitely make you cum	8/31/2015 8/31/2015 6:12:25 PM(UTC-4)
Rob N/A	Have you ever made yourself cum?	8/31/2015 8/31/2015 6:12:43 PM(UTC-4)
UC-1	Ok. How	8/31/2015 8/31/2015 6:12:45 PM(UTC-4)
Rob N/A	First with my fingers and tongue	8/31/2015 8/31/2015 6:13:07 PM(UTC-4)
UC-1	Ok. I will let u	8/31/2015 8/31/2015 6:13:24 PM(UTC-4)
UC-1	U just teasing me. It's ok if u are	8/31/2015 8/31/2015 6:13:53 PM(UTC-4)

4)

Rob N/A	After your first orgasm, I'll lay you on your back, get between your legs, and fuck you gently with my hard cock until you cum again	8/31/2015 8/31/2015 6:13:55 PM(UTC-4)
UC-1	I'd be so nervous. I would want u to have fun. Wouldn't want to mess up	8/31/2015 8/31/2015 6:14:30 PM(UTC-4)
Rob N/A	Don't worry, I'll tell you what to do	8/31/2015 8/31/2015 6:14:50 PM(UTC-4)
Rob N/A	All you have to do is enjoy it, tell me how much you're enjoying it, and moan when it feels good	8/31/2015 8/31/2015 6:15:20 PM(UTC-4)
UC-1	Ok. Idk if we can do all that in the park	8/31/2015 8/31/2015 6:15:45 PM(UTC-4)
UC-1	Sometimes people there	8/31/2015 8/31/2015 6:15:57 PM(UTC-4)
Rob N/A	We'll have to find someplace where no one is, but if the park isn't totally empty maybe we can just do some stuff, like you can blow me and I'll finger you	8/31/2015 8/31/2015 6:16:50 PM(UTC-4)
UC-1	Ok□	8/31/2015 8/31/2015 6:17:06 PM(UTC-4)

17. During the chat, "Rob N/A" requested that UC-1 provide him with a photo focusing on UC-1's lips and mouth. "Rob N/A" sent UC-1 a photograph of himself lying on a bed. UC-1 sent "Rob N/A" a photograph of an actual female who appears to be a young teen. During the chat, "Rob N/A" became suspicious as to the actual identity of UC-1.

18. On or about September 1, 2015, UC-1 received a message from "Rob" on the "Meet24" application. At this time, "Rob" stated that he deleted his Kik profile and further stated "do you know how many fake female profiles are out there, a guy needs some reassurance that he is talking to who he thinks he is talking to, and not, I shudder to think."

19. On or about September 24, 2015, a second Delaware State Trooper, who is female

(UC-2), assumed the role of UC-1 in the online communication with “Rob N/A.” At approximately 3:26 p.m., on September 24, 2015, “Rob N/A” and UC-2 chatted via the KIK application. During this chat session, “Rob N/A” sent UC-2 a video of himself. In the video, Rob N/A” can be seen in what appears to be a small room wearing what appears to be a tactical vest and a baseball-style hat with sunglasses. The video portrays “Rob N/A” in a small room waving at the camera. “Rob N/A” stated in the online chat with UC-2 that he was on break and had to go relieve someone.

19. On or about September 24, 2015, UC-1 obtained the Maryland Department of Motor Vehicle photo for Lee Robert MOORE. (DOB **/**78). The Maryland Department of Vehicle photograph appears to be the same individual depicted in the photographs and videos sent to UC-1 by “Rob N/A” and contained in the “Rob” Meet24 profile.

20. On or about September 24, 2015, at approximately 3:28 P.M., at “Rob N/A’s” request, UC-2 provided “Rob N/A” with a photograph of herself. This photograph appears to depict a young teenage female. “Rob N/A” responded: “you look cute . . . Now do a video.” UC-2 then sent a video of herself, which appears to depict a teenage female holding a small cat near her face. During the chat, “Rob N/A” stated that he was “sitting in the break room” and “had 5 minutes [to chat]” before he had “to go relieve someone else to go on break.”

21. On or about September 25, 2015 at approximately 7:27 A.M., “Rob N/A” and UC-2 chatted via the KIK application. During this chat session, “Rob N/A” states that he just woke up and subsequently sends UC-2 a photograph of himself lying on a bed. On September

25, 2015 at approximately 10:56 P.M., “Rob N/A” sends UC-2 a second photograph of himself lying on a bed.

22. On or about September 28, 2015 at approximately 4:00 P.M., “Rob N/A” and UC-2 chatted via the Kik application. During this chat session, “Rob N/A” states that he is “at work,” and approximately 30 minutes later, “Rob N/A” writes that he is “on break now” and asks what UC-2 is currently wearing. “Rob N/A” and UC-2 discuss taking a motorcycle ride together and “Rob N/A” asks UC-2 what would make her more nervous: “riding on the motorcycle with me or having sex with me?” Their conversation ensues for approximately 40 minutes, during which “Rob N/A” and UC-2 discuss sexual contact with each other and a possible meeting.

Excerpts from that conversation include:

09/28/2015 16:30:11 EDT	Rob N/A RobertTheW1se	Nice, I wish I were there right now
09/28/2015 16:30:31 EDT	Rob N/A RobertTheW1se	I'd carry you to your bedroom though
09/28/2015 16:30:39 EDT	Rob N/A RobertTheW1se	Lay you down on the bed
09/28/2015 16:30:43 EDT	UC-2	Carry me? Lol
09/28/2015 16:30:47 EDT	UC-2	Oo
09/28/2015 16:31:05 EDT	Rob N/A RobertTheW1se	Yes, carry you with your legs wrapped around me
9/28/2015 16:31:17 EDT	Rob N/A RobertTheW1se	Kissing you along the way
09/28/2015 16:33:04 EDT	Rob N/A RobertTheW1se	You cute young legs
09/28/2015 16:32:32 EDT	Rob N/A RobertTheW1se	Once I laid you down on your bed, I would slip those shorts off of you
09/28/2015 16:32:57 EDT	Rob N/A RobertTheW1se	And kiss my way up your legs

09/28/2015 16:35:27 EDT	UC-2	Do u really want to come see me?
09/28/2015 16:35:30 EDT	Rob N/A RobertTheW1se	Have you ever fingered yourself?
09/28/2015 16:35:34 EDT	Rob N/A RobertTheW1se	I do
09/28/2015 16:36:02 EDT	Rob N/A RobertTheW1se	As soon as I have a free day
09/28/2015 16:37:28 EDT	UC-2	I want to meet u...just hope i dont bore u
09/28/2015 16:37:51 EDT	UC-2	I haven't done very much
09/28/2015 16:37:55 EDT	Rob N/A RobertTheW1se	I can't imagine that
09/28/2015 16:38:06 EDT	Rob N/A RobertTheW1se	That doesn't bother me
09/28/2015 16:38:15 EDT	UC-2	ur so nice
09/28/2015 16:38:30 EDT	Rob N/A RobertTheW1se	It's nice of you to notice
09/28/2015 16:39:17 EDT	UC-2	I hope u hav a free day soon
09/28/2015 16:41:16 EDT	Rob N/A RobertTheW1se	Me too, haha, but this damn summer and fall has been Awful
09/28/2015 16:42:15 EDT	UC-2	Ugh i hope i get to see u
09/28/2015 16:43:49 EDT	Rob N/A RobertTheW1se	Breaks over

23. On or about October 5, 2015, at approximately 5:17 P.M. "Rob N/A" and UC-2 chatted via the Kik application. During this chat session, "Rob N/A" states "that works sucks today" and further informs UC-2 that he is "Sitting at box office style booth checking ID's for entrance into a building." "Rob N/A" further asks what UC-2 is wearing and requests that UC-2 send him something "exciting." "Rob N/A" tells UC-2 that he is wearing "black tactical pants, a

long sleeve polo, and my vest.” At “Rob N/A’s request, UC-2 sent “Rob N/A” a photograph of herself. This picture appears to depict a young teenage female holding a small cat.

24. On or about October 6, 2016, at approximately 7:37 P.M., “Rob N/A” and UC-2 chatted via the Kik application. During this chat session, “Rob N/A” states that he is getting ready to zip up his pants after arriving home from work. “Rob N/A” sends UC-2 a picture of his lower body from the waist down, with his jeans unzipped. “Rob N/A” then asks UC-2 if she will “take a picture for me in your panties” if he “pushes [his] boxers down.” After UC-2 responds, “Yes maybe,” “Rob N/A” then sends a photograph depicting an adult male holding his underwear down below his exposed scrotum and erect penis. As the chat continues, “Rob N/A” asks UC-2 “You like?” He also asks if she thinks his penis is “big” and states he imagines UC-2 “on your knees in front of me with you[] hand wrapped around it, staring at it, and, looking up at me, and then putting it in your mouth.” “Rob N/A” then requests that UC-2 leave the living room (where she told him she was watching tv with her mother) and go into the bathroom and bedroom to take photographs of herself in her panties. After UC-2 tells “Rob N/A” that she “had a bad experience with sending a pic before with a person who said he would put it online,” “Rob N/A” continued to attempt to convince UC-2 to send pictures of her in her panties, telling her he would not share them with anyone and wanted “to make you all mine.” Finally “Rob N/A” and UC-2 discuss the logistics of a possible meeting for sexual activity. A summary of the chat is as follows:

10/06/2015 19:43:51 EDT	RobN/A RobertTheW1se	You like?
10/06/2015 19:44:48 EDT	UC-2	Yea lol

10/06/2015 19:45:07 EDT	Rob N/A RobertTheW1se	What do you like about it?
10/06/2015 19:50:12 EDT	UC-2	Idk haha i haven't seen many
10/06/2015 19:57:14 EDT	RobN/ARo bertTheW1se	I'm imagining you on your knees in front of me with you hand wrapped around it, staring at it, and looking up at me, and then putting it in your mouth
10/06/2015 19:58:44 EDT	Rob N/A RobertTheW1se	Do you think it's big?
10/06/2015 19:58:07 EDT	UC-2	I'm nervous haha but excited
10/06/2015 20:01:15 EDT	Rob N/A RobertTheW1se	Well go to your bedroom, or the bathroom, and take off your pants
10/06/2015 20:02:50 EDT	Rob N/A RobertTheW1se	I do want pictures of you. As many as you will send me
10/06/2015 20:02:54 EDT	Rob N/A RobertTheW1se	I love seeing you
10/06/2015 20:03:16 EDT	Rob N/A RobertTheW1se	And I do want to come see you
10/06/2015 20:11:50 EDT	Rob N/A RobertTheW1se	So what do you say, wanna show me something?
10/06/2015 20:13:16 EDT	UC-2	My mom is watching tv with me now but I'll try to sneak away nd send one
10/06/2015 20:14:29 EDT	Rob N/ARobertTheW1se	I would suggest the bathroom, that's an excusable place to go for a few minutes
10/06/2015 20:48:12 EDT	Rob N/A RobertTheW1se	I'm hard thinking about your body

25. On or about October 7, 2016, at approximately 9:00 P.M., "Rob N/A" and UC-2 chatted via the Kik application. During this chat session, "Rob N/A" informed UC-2 that he was

being sent “overseas” this weekend for work and would not be able to communicate for about two weeks since he did not have an internet connection. UC-2 provided “Rob N/A” with a photograph of herself which appeared to depict a young teenage female. The following conversation ensued:

10/07/2015 22:02:58 EDT	UC-2	Did u not like my pic ☹
10/07/2015 22:03:25 EDT	Rob N/A RobertTheW1se	I like what I can see ☺
10/07/2015 22:03:46 EDT	RobN/A RobertTheW1se	It's pretty dark, but I see a body I would love to touch and experience
10/07/2015 22:04:07 EDT	UC-2	Thanks ☺ ! glad u like
10/07/2015 22:04:18 EDT	UC-2	Sad ur leaving :☹
10/07/2015 22:04:22 EDT	RobN/ARobertTheW1se	It's not you in your panties, but it's nice

26. On or about October 8, 2016, at approximately 7:00 A.M, “Rob N/A” and UC-2 chatted on the Kik application. During this chat session, “Rob N/A” informed UC-2 that he was going be going “overseas” and that it would only be for a “few weeks.”

27. On or about October 26, 2015, UC-2 received a message from “Rob N/A” via the Kik application. At this time, “Rob N/A” informed UC-2 that he was back from his trip.

28. On or about October 28, 2015, “Rob N/A” and UC-2 chatted on the Kik application. According to UC-1, during this chat session, “Rob N/A” sent UC-2 a photograph of himself. This photograph depicted “Rob N/A” with no shirt on.

29. On or about November 6, 2015, at approximately 11:00 p.m., Lee Robert

MOORE was informed by the United States Secret Service that he was being placed on administrative leave, and his service weapon and badge were confiscated. Secret Service officials subsequently instructed MOORE to report to the Maryland State Police barracks in Centerville, Maryland, at 8:00 a.m., November 9, 2015.

30. On or about November 8, 2015, UC-2 received a message, via Kik, from “Rob N/A,” which stated, in part: “I don’t think we should talk anymore. I can’t explain, but I have too much going on, and I need to pull away from talking to people online altogether. This will be my last message. I’m sorry, but I won’t be on kik or meet 24 again.”

31. On or about the morning of November 9, 2015, MOORE reported to the Maryland State Police barracks, where he was arrested on Delaware state charges including Solicitation of a Minor. MOORE waived his *Miranda* rights and participated in a recorded interview with a law enforcement agent. During that interview, MOORE was shown the “Meet24” profile used by UC-1 and UC-2. MOORE admitted that he recognized the profile as a “Meet24” user with whom he had been communicating, and that he believed that this person was a 14-year-old female from Delaware. MOORE was also shown and identified as his own the “Meet24” of “Rob” referenced above, and the Kik profile of “Rob N/A” referenced above.

32. Also during this interview, MOORE admitted to communicating with UC-2 while on the job at the White House. MOORE admitted to engaging in these communications through late on the evening of November 8, 2015 – during the last of which he terminated the relationship with UC-2. As noted above, MOORE had been placed on administrative leave by the Secret Service on November 7, 2015.

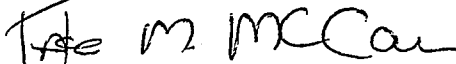
33. MOORE also admitted that he used "Meet24" to communicate with numerous other users who he believed to be minor, teenage girls. In particular, MOORE stated that he had an sexual interest in 14 year-old females and had engaged such individuals in online chats about sexual matters.

34. Finally, MOORE was shown the photograph depicting an exposed, erect penis that "Rob N/A" transmitted to UC-2. MOORE admitted that he took this photograph and transmitted to UC-2.

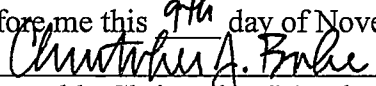
CONCLUSION

35. Based on the above information, there is probable cause to believe that between, on or about August 24, 2015 and November 8, 2015, LEE ROBERT MOORE transmitted obscene material to a minor, in violation of Title 18, United States Code, Section 1470.

Respectfully submitted,



Patrick McCall
Special Agent
Homeland Security Investigations (HSI)

SUBSCRIBED and SWORN
before me this 9th day of November 2015

Honorable Christopher J. Burke
United States Magistrate Judge