
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 15 - 4032
 :
 v. : Hon. Michael A. Hammer
 :
 ERIC BING : **CRIMINAL COMPLAINT**

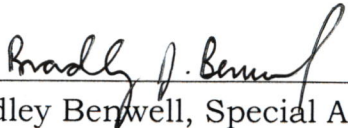
I, Bradley Benwell, being duly sworn, state the following is true
and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the 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 page and made a part hereof.




Bradley Benwell, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,
March 25, 2015, in Newark, New Jersey



HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



ATTACHMENT A

From in or about 2008, through in or about July 2011, in Union County, in the District of New Jersey, and elsewhere, defendant

ERIC BING

did use the mail, or any facility or means of interstate and foreign commerce, to knowingly persuade, induce, entice, and coerce an individual, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Bradley Benwell, am a Special Agent with the United States Department of Homeland Security. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. 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. In or around 2008, a female victim living overseas who was approximately fourteen years old at the time (the "Victim") sent an email to a fan website associated with a rock band. The Victim received a reply email purporting to be from the lead singer of the band ("Band Singer"). Band singer asked for pictures of the Victim.

2. Subsequently, "Band Singer" began an online relationship with the Victim using internet-based communications, including chat, email, online video games, and a one-way webcam. Over time, "Band Singer" made increasingly explicit sexual requests to the Victim for the Victim to send pictures and videos of herself using her webcam. The Victim complied with many of these requests between in or about 2008 and at least in or about 2010, during which time the Victim was under the age of 18.

3. In or around 2010 or 2011, "Band Singer" revealed to the Victim that he was not the lead singer of the band and that his real name was "Eric," at which time the Victim stopped sending sexually explicit pictures and videos to the individual she had known as "Band Singer."

4. In or around October 2014, law enforcement learned that one of the email addresses "Band Singer" used to communicate with the Victim was associated with the residence of defendant Eric Bing ("BING") in Clark, New Jersey.

5. On or about November 12, 2014, law enforcement executed a search warrant at BING's residence in Clark, New Jersey. During the course of that search, law enforcement seized a number of electronic devices, including computers and hard drives. One of the computers law enforcement seized was

a Dell Dimension desktop (the "Desktop"). In addition, law enforcement seized a Seagate external hard drive (the "S Drive") and a Western Digital external hard drive (the "W Drive").

6. Law enforcement's forensic examination of the Desktop, S Drive, and W Drive revealed approximately 11 videos containing child pornography of the Victim. For example, one of the videos found on the Desktop is child pornography of the Victim believe to be filmed in or about September 2009 using the Victim's webcam and described here:

DESCRIPTION
The length of the video is 33:07. The video is of a young, pubescent female who is not wearing any clothing. At points during the video, the female puts on a yellow robe and approaches the camera. In the video the female is lying on a bed with her genitals exposed and is masturbating. In the background of the video is a red and white wall, an electric guitar, and a bed with a red covering and with various stuffed animals on it.

7. BING knew that the Victim was a minor in 2008, 2009, and 2010, during which time defendant BING was not a minor.

8. Based upon my education, training, experience and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography images described in Paragraph 6 above were shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, by any means, including by computer.