

FILED
U.S. District Court
District of Kansas

OCT 06 2023

Clerk, U.S. District Court
By [Signature] Deputy Clerk

UNITED STATES DISTRICT COURT
District of Kansas

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. 23-M-6267-01-BGS

JOEL WOMOCHIL,

Defendant.

COMPLAINT

THE UNITES STATES ATTORNEY CHARGES:

COUNT 1

**Receipt of Child Pornography
18 U.S.C. § 2252A(a)(2)**

On or about February 14, 2023, in the District of Kansas, the defendant,

JOEL WOMOCHIL,

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

COUNT 2

**Possession of Child Pornography
18 U.S.C. 2252A(a)(5)(B)**

On or about August 15, 2023, in the District of Kansas, the defendant,

JOEL WOMOCHIL,

knowingly possessed and accessed with intent to view any computer disk and other material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and such child pornography involved a prepubescent minor who had not attained 12 years of age, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.



TRAVIS PUTRAH
Special Agent
U.S. Department of Homeland Security

Subscribed and sworn before me this 6th day of October, 2023.



THE HONORABLE BROOKS SEVERSON
United States Magistrate Judge

PENALTIES

Count 1 – Receipt of Child Pornography

- Punishable by a term of imprisonment of not less than five (5) years but not more than twenty (20) years. If such person has a prior conviction under section 1591, chapter 71, chapter 109A, chapter 110, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, or sex trafficking of children, the term of imprisonment shall be for not less than fifteen (15) years nor more than forty (40) years. [18 U.S.C. § 2252A(b)(1)]
- A term of supervised release of not less than five (5) years and up to life. 18 U.S.C. § 3583(k).
- A fine not to exceed \$250,000. 18 U.S.C. § 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).
- A mandatory special assessment of \$5,000.00 if defendant is a non-indigent person. 18 U.S.C. § 3014(a)(3).
- An additional assessment of not more than \$35,000.00. 18 U.S.C. § 2259A(a)(2).

Count 2 – Possession of Child Pornography

- Punishable by a term of imprisonment of not more than twenty years (20) years. If such person has a prior conviction under chapter 71, chapter 109A, chapter 110, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, the term of imprisonment shall be for not less than ten (10) years nor more than twenty (20) years. 18 U.S.C. § 2252A(b)(2).
- A term of supervised release of not less than five (5) years and up to life. 18 U.S.C. § 3583(k).
- A fine not to exceed \$250,000.00. 18 U.S.C. § 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).
- A mandatory special assessment of \$5,000.00 if defendant is a non-indigent person. 18 U.S.C. § 3014(a)(3)
- An assessment of not more than \$17,000.00. 18 U.S.C. § 2259A(a)(1).

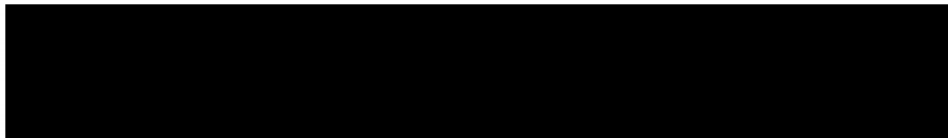
AFFIDAVIT

I, Travis Putrah, am a Special Agent ('SA') with the Department of Homeland Security's ('DHS'), Homeland Security Investigations ('HSI'), assigned to the Office of HSI Wichita, Kansas. This criminal complaint is based on the following facts which were provided by the National Center for Missing & Exploited Children ('NCMEC'), Synchronoss Technologies ('Synchronoss'), and other duly sworn law enforcement officers involved in the investigation.

1. On or about August 9, 2023, Synchronoss made a CyberTipline report to NCMEC¹ regarding the uploading of files containing child exploitation material² to their cloud-based storage backup service³.

2. On or about August 15, 2023, investigators reviewed Cybertipline report 170402754, and the files of child exploitation material provided to NCMEC by Synchronoss. The following are some of the observations made by investigators after reviewing the files:

- a. File "a4fe9afa8f4a47e2975451cdee968a93_10e269b83cabe5f8484307fac014103f8b865b7ae39569e06651fe5a6b3ec4dc" is a video file



- a. File "a4fe9afa8f4a47e2975451cdee968a93_12a52c5a01e6f377b3d07f82fde98e096eb5b54e6dce293cc4c3c06e1964fb76" is a video file approximately 2 minutes in length. The video shows



¹ NCMEC is a nonprofit organization established by the United States Congress. NCMEC operates the CyberTipline, which was established by Congress to process reports of child sexual exploitation. NCMEC reviews these reports and shares them with the appropriate law enforcement agency and/or Internet Crimes Against Children (ICAC) task forces. Anyone can make a report to the CyberTipline but reporting is required for certain electronic service providers who become aware of child exploitation material.

² This material may also be referred to as Child Pornography, as defined in 18 U.S.C. § 2256(8)

³ Synchronoss Technologies is a cloud-based storage back up service that is available to Verizon Wireless customers who want to store photos, videos, and other digital files managed by Synchronoss Personal Cloud services.



ankles appear to be bound by black rope.

3. In total, twelve (12) files were provided by Synchronoss. All 12 files contained pre-pubescent children engaged in sexually explicit conduct.

4. Synchronoss identified that the account containing the child pornography was associated with telephone number [REDACTED]. Utilizing databases available to law enforcement, investigators learned that telephone number [REDACTED] was associated with **JOEL JUSTICE WOMOCHIL ('WOMOCHIL')**.

5. Additionally, investigators identified WOMOCHIL as a detention deputy employed by the Butler County, Kansas, Sheriff's Office. WOMOCHIL had also been employed as the police chief of the Burns, Kansas, police department.

6. On or about August 15, 2023, WOMOCHIL was contacted by his supervisor utilizing phone number [REDACTED]. WOMOCHIL was asked to report to the Butler County Detention Facility. After arriving at his place of employment, WOMOCHIL was interviewed by investigators.

7. During a post-Miranda interview, WOMOCHIL confirmed that the phone number [REDACTED] was assigned to his cellular telephone. WOMOCHIL stated that he resided at [REDACTED] in El Dorado, Kansas. WOMOCHIL stated that he had a Verizon cellular telephone and has been the sole owner/operator of that phone since 2020. Additionally, WOMOCHIL stated that he was the sole owner/operator of a laptop. Investigators detained the cellular telephone that was in WOMOCHIL's possession.

8. On or about August 15, 2023, WOMOCHIL's fiancé, [REDACTED] [REDACTED] was interviewed by investigators. [REDACTED] stated that WOMOCHIL had an office inside their residence, located at [REDACTED] El Dorado, Kansas. [REDACTED] stated that WOMOCHIL had a laptop inside that office.

9. On or about August 15, 2023, investigators executed a search warrant at WOMOCHIL's residence. A laptop, an external hard drive, and other electronics were located and seized from WOMOCHIL's office and the residence.

10. On or about August 15, 2023, investigators obtained and executed a search warrant for WOMOCHIL's cellular telephone. During an examination of that device, investigators noted that the child pornography from CyberTipline report 170402754 was located on that device. Investigators also located additional images of infants and toddlers being sexually assaulted.

11. During the examination of WOMOCHIL's cellular telephone, investigators located a Twitter (now referred to as X) account associated with WOMOCHIL's cellular telephone utilizing the username "@ictbaddad".

12. Investigators conducted a search online and located the publicly available Twitter/X account @ictbaddad. The following is a screenshot of the Twitter/X profile:



13. Investigators noted that pedobear⁴ was utilized on the Twitter/X’s main profile page.

14. During a review of “@ictbaddad” publicly available Twitter/X webpage, investigators located fifteen (15) images that had been posted to the account. Multiple photos of an erect male’s penis were observed in those image files. Investigators noted that the photos of the erect male’s penis had been captured inside WOMOCHIL’s residence at [REDACTED] in El Dorado, Kansas.

15. On or about August 23, 2023, investigators obtained and executed a search warrant for WOMOCHIL’s “@ictbaddad” twitter account. On or about August 28, 2023, investigators obtained Twitter/X’s response to the search warrant for account “@ictbaddad”.

16. During a review of the content provided by Twitter/X, investigators located a direct message sent on or about February 14, 2023, from another Twitter/X user to the “@ictbaddad” Twitter account. The following image file was sent to ICTBADDAD in that direct message:

⁴ Pedobear is a pedophilic cartoon utilized by some individuals engaged in the pedophile community. It can be used by this community to identify individuals who have a sexual interest in children.

- a. File "1625507436386820100-ua5AffJp" is an image file. The image file



Below this image the words "Real mom and son" can be seen.

17. The following is the conversation that takes place between the unidentified user and ICTBADDAD in that direct message:

- a. Unidentified User: I post real incest.
- b. ICTBADDAD: What exactly is on it? Irl?
- c. ICTBADDAD: Cashapp is my preferred.
- d. Unidentified User: I accept cashapp or PayPal as payment.
- e. ICTBADDAD: Ok and how do I pay you?
- f. Unidentified User: To join the premium incest telegram channel is \$15.
- g. ICTBADDAD: I like your real incest channel.

18. On or about August 16, 2023, investigators obtained a search warrant for the laptop seized from WOMOCHIL's residence. During the examination of the laptop, at least eight hundred fifty-one (851) thumbnail images⁵ were located on the laptop. Examiners were able to see, utilizing the thumbnails file path, that the thumbnail images were linked to the external hard drive seized from WOMOCHIL's residence.

19. On or about August 22, 2023, investigators obtained a search warrant for the external hard drive. During the examination of the external hard drive, numerous images of child exploitation material were located.

⁵ Thumbnails are reduced-size versions of pictures or videos, used to help in recognizing, organizing and indexing those pictures or videos.

Based on the foregoing facts, I believe there is probable cause to find that **JOEL JUSTICE WOMOCHIL**, residing in El Dorado, Kansas, has engaged in violations of 18 U.S.C § 2252(a)(2), Receipt of Child Pornography on or about February 14, 2023; and engaged in violations of 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography, on or about August 15, 2023.



TRAVIS PUTRAH, Special Agent
Homeland Security Investigations

Subscribed and sworn before me this 6th day of October 2023.



HONORABLE BROOKS SEVERSON
United States Magistrate Judge.