

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

PAUL CAMPBELL,
also known as "boredad"

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about April 28, 2009, and May 4, 2009, at Cortland, in the Northern District of Illinois, Eastern Division,

PAUL CAMPBELL, also known as "boredad,"

defendant herein, using a means or facility of interstate commerce, namely, the internet, knowingly transported and shipped child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, computer files titled, "0_21461600_1152349868.jpg" and "Slide 213.jpg"; in violation of Title 18, United States Code, Section 2252A(a)(1). I further state that I am a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
ANDREW ROSZEL
Special Agent, U.S. Department of Homeland
Security, Immigration and Customs
Enforcement

Sworn to before me and subscribed in my presence,

November 18, 2009
Date

at Chicago, Illinois
City and State

SUSAN E. COX, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT)
) ss
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Andrew Roszel, being duly sworn, state as follows:

1. I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”). I have been employed as a Special Agent with ICE and its predecessor agency, the Immigration and Naturalization Service, since 1988.

2. As part of my duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media, including computer media.

3. This affidavit is made in support of a criminal complaint alleging that PAUL CAMPBELL, also known as “boredad,” knowingly transported and shipped child pornography, as that term is defined in Title 18, United States

Code, Section 2256(8)(A), using a means or facility of interstate commerce, in violation of Title 18, United States Code, Section 2252A(a)(1).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited establishing probable cause in support of a criminal complaint charging CAMPBELL with transporting and shipping child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

A. Website A

5. Website A is a website on the internet that functions as a free website offering numerous links to various adult pornography websites. The website also offers a special “chat” feature where users can access an assortment of different “rooms.” In these chat rooms, the user can hold online text conversations, post messages, photos, graphics, etc. to the entire room or to a specific user. Before a user can access these chat rooms, the user is taken to a website where they must enter a screen name and indicate if they are male or female. The screen name is not permanent and is only valid for the user’s

current chat session. A user may change screen names each time he or she logs into the chat portion of the website and Website A does not require a user to enter his or her true identity or to register with the website. In addition, there is a warning banner that appears before a user enters the chat room stating the “Chat rules.” The rules stated in the warning banner include: (1) “posting photos, graphics or cartoons showing persons under 18 years of age is not allowed”; (2) “child pornography or other illegal material will immediately be reported to the poster’s local authorities”; and (3) “requesting the images of the above nature is not allowed.” The banner further states that “[u]sers breaking these rules will be banned” and that “[a]ll posted pictures and conversations, public and private, are logged and supervised.”

6. After entering a user name of his or her choice and clicking on the “Log in” hyperlink, the user is then taken to a screen with yet another warning banner posted on it. The banner features a picture of a young female child and warns that “[p]osting photos, graphics or cartoons showing persons under 18 years of age is not allowed” and that “[c]hild pornography or other illegal material will immediately be reported to the poster’s local authorities.” The banner further warns that “[a]ll posted pictures and conversations, public and private, are logged and supervised” and that Website A “may disclose these communications to the authorities at its discretion.” Following this disclaimer

is a hyperlink marked “ACCEPT” that a user must click before gaining access to the chat room.

7. Law enforcement agents from ICE received information that users of the chat rooms on Website A may be distributing child pornography. The administrator of the website agreed to cooperate with ICE in its effort to combat the trading of child pornography. ICE agents were granted access to monitor the chat rooms on the website, including all messages and pictures posted by the users, the Internet Protocol Addresses of the users who post messages or pictures, and the time stamp associated with the messages or pictures which provide the time and date of the posting.

B. Transmission of Child Pornography on Website A by User “boredad”

8. On or about May 5, 2009, while monitoring the Website A chat room, a law enforcement agent from ICE found that on April 28, 2009, a user using the screen name “boredad” and the IP address of 72.69.114.97 (“target IP address”), had engaged in an online conversation in the chat room. The ICE agent obtained “screen captures” of this posting, which produced all messages and pictures that were posted by the user and the target IP address.

9. I have reviewed the screen captures for the April 28, 2009 posting. I have determined that the user “boredad” uploaded and sent several images of

child pornography and several additional images of child erotica through the chat room on April 28, 2009. The first image, titled "13pussy.jpg," depicts a prepubescent female pulling up her clothing and exposing her genitals. The second image, titled "0_21461600_1152349868.jpg," depicted a female minor, approximately between the ages of five to ten years old, being vaginally penetrated by a penis. The third image, titled "0_73090100_1233888359.jpg," depicts a prepubescent female, approximately between the ages of four to eight years old, in frontal nude pose with her legs spread. The fourth image, titled "Slide 307.jpg," depicts an adult female performing oral sex on what appears to be a male child.

10. On or about May 5, 2009, while monitoring the chat room, a law enforcement agent from ICE found that on May 4, 2009 a user with the screen name "boredad" and the target IP address engaged in an online conversation in the chat room. The ICE agent obtained the screen capture of this posting, which produced all messages and pictures that were posted by the user and the target IP address.

11. I have reviewed the screen captures for the May 4, 2009 posting. I have determined that the user "boredad" using the target IP address had uploaded to the chat room five images of child pornography and several additional images of children. The first image, titled "slide3.jpg," depicts a

prepubescent female, approximately eight to twelve years old, wearing only underwear in a frontal pose with her breasts exposed and legs spread. The second image, titled “slide307.jpg,” depicts a fully nude prepubescent male minor approximately between the ages of seven and ten years old. The third image, titled “Slide 263.jpg,” depicts an adult male penis being held by a small hand that appears to be that of a child. The fourth image, titled “18.jpg,” depicts the rear of a young female child with her genitals exposed. The fifth image, titled “Slide 100.jpg,” also depicts the rear of a young female child with her genitals exposed. The sixth image, titled “Slide 213.jpg,” depicts two prepubescent females in a full front pose making genital to genital contact. These images were sent to a chat room user with the screen name “Sherri.”

12. The screen captures from the May 4, 2009, postings by “boredad” also show several text messages sent by “boredad” to other chat room users that refer to the existence of a collection of photographs that may qualify as child pornography. On May 4, 2009, at approximately 12:34 p.m., for example, the user “boredad” sent a message to the chat room user “lonelytxmomma” stating “Whats you addy mom? I have pics I’ll share . . .”

13. The screen captures from May 4, 2009, also show a series of messages sent from “boredad” to another chat room user, “Sherri,” that refer to nude pictures, 11 year olds, and a collection of photographs that may qualify as

child pornography. At approximately, 2:17 p.m., “boredad” sent a message to “Sherri,” asking, “have you had sex with her?” Shortly thereafter, he sent another message to “Sherri” at approximately 2:25, stating, “lol . . . Ok . . . most 11 yr olds would say the same thing.” Later, at approximately 2:45 p.m., “boredad” sent a message to “Sherri” stating, “idk . . . just a pic in my collection.” At approximately 3:51 p.m., “boredad” sent a message to “Sherri” stating, “no . . . no more of me naked.” Later, at approximately 4:15 p.m., “boredad” sent another message to “Sherri” referring to a collection of photographs and stating, “just a pick [sic] from my collection.”

C. Identification of CAMPBELL as “boredad”

14. On or about July 9, 2009, law enforcement agents determined that the target IP address is owned by the Internet Service Provider (“ISP”) Verizon Communications and that the target IP address originated out of Cortland, Illinois.

15. On or about July 9, 2009, in response to a subpoena, Comcast provided subscriber information for the target IP address. The target IP address was registered to CAMPBELL at a specific location on West Carol Avenue in Cortland, Illinois. Information provided by the Illinois Secretary of State’s Office, Exelon Corporation, and the United States Postal Service confirmed that CAMPBELL lives at this location in Cortland, Illinois.

D. Execution of Federal Search Warrant

16. On or about November 10, 2009, Magistrate Judge Denlow issued a warrant to search CAMPBELL's residence at on West Carol Avenue in Cortland, Illinois.

17. On November 18, 2009, ICE agents executed the search warrant at CAMPBELL's home. During a preliminary review of computers found on the premises, agents found thousands of images, the vast majority of which appear to constitute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A).

18. In the course of executing the search warrant, and after advising him of his *Miranda* rights, ICE agents interviewed CAMPBELL. During the interview, CAMPBELL admitted to possessing, trading, and transporting child pornography over the internet on various internet websites, including Website A and the yahoo.com messenger service.

E. Conclusion

19. Based on the foregoing, I believe there is probable cause that PAUL CAMPBELL knowingly transported and shipped child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), using a means or facility of interstate commerce, in violation of Title 18, United States Code, Section 2252A(a)(1).

FURTHER AFFIANT SAYETH NOT.

ANDREW ROSZEL
Senior Special Agent
Department of Homeland Security
U.S. Immigration and Customs
Enforcement

Subscribed and sworn before me on November 18, 2009.

SUSAN E. COX
United States Magistrate Judge