

---

# United States District Court

## WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

KAI LUNDSTROEM PEDERSEN,  
[DOB: 03/09/50]

18 U.S.C. §2252(a)(2) (**Count One**)

NLT 5 Years Imprisonment

NMT 20 Years Imprisonment

NMT \$250,000.00 Fine

Supervised Release: 5 Years to Life

Class C Felony

\$100 Mandatory Special Assessment, Each Count

### **AMENDED CRIMINAL COMPLAINT**

**Case Number: 10-0139-REL-01**

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

#### **COUNT ONE:**

On or about July 20, 2010, in the Western District of Missouri and elsewhere, KAI LUNDSTROEM PEDERSEN knowingly distributed a visual depiction, and the visual depiction had been transported in and affecting interstate and foreign commerce, and the visual depiction contained materials which had been transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

I further state that I am a special agent with Homeland Security Investigations, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No.

/s/ James D. Kanatzar

Special Agent James D. Kanatzar, HIS-ICE

Sworn to before me and subscribed in my presence,

September 3, 2010

at

Kansas City, Missouri

Date

City and State

ROBERT E. LARSEN

United States Magistrate Judge

Name and Title of Judicial Officer

/s/ Robert E. Larsen

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF MISSOURI**

**AFFIDAVIT IN SUPPORT OF AMENDED COMPLAINT**

**INTRODUCTION**

I, James D Kanatzar, being first duly sworn state:

I am a Special Agent of the Immigration and Customs Enforcement currently assigned to the Office of the Assistant Special Agent in Charge, Kansas City, Missouri, and have been a federal officer for over 21 years. I have had the opportunity to conduct, coordinate and/or participate in numerous investigations relating to the sexual exploitation of children. I have also had the opportunity to observe and review numerous examples of child pornography in all forms of media including computer media, to discuss and review these materials with endocrinologists and pediatricians, and have received training and instruction from experts in the field of investigation of child pornography.

The information in this affidavit is based largely upon an investigation conducted by Det. Thomas Cates, who is employed as a Criminal Investigator of the Buchanan County Sheriff's Department ("BCSD") and has been so employed since January 7, 2003. Since 2007, Det. Cates has been assigned the Western Missouri Cyber Crimes Task Force, an Internet Crimes Against Children task force, and assigned to investigate matters involving child sexual exploitation, online child sexual exploitation, and child pornography facilitated by the Internet. As part of Det. Cates' duties, he has received training in the psychology of child exploitation offenders, how these offenders utilize the Internet to engage in child exploitation crimes, and how computers retain evidence detailing that criminal conduct. Further, Det. Cates has participated

in numerous online investigations involving child pornography and the enticement of minors to engage in illicit sexual activity.

Based upon my conversations with Det. Cates and others involved in the investigation, and my review of the evidence to date, I believe the facts set forth establish probable cause to believe that KAI LUNDSTROEM PEDERSON, d/o/b 3/9/50, has violated Title 18, United States Code, Section 2252(a)(2), that is, distribution of child pornography in or affecting interstate and foreign commerce.

### **STATEMENT OF PROBABLE CAUSE**

On August 13, 2010, Detective Thomas Cates of the Buchanan County Sheriff's Department, Western Missouri Cyber Crimes Task Force was contacted by R.L., a resident of Buchanan County, Missouri and the mother of minor victim L.S., regarding a matter in which her 11-year-old daughter, L.S., engaged in online sexual conversation and webcam communication with an adult male. The mother informed Detective Cates that she had first learned of these events after receiving messages via Facebook from a user profile named "Layne, Michele" which contained images of her daughter L.S. nude, in which L.S. was pictured masturbating via digital penetration of her vagina as well as several images of L.S. nude with her legs spread and the camera focused on her vagina. The mother stated that after finding these images on her Facebook account she spoke with her daughter, L.S. The mother then reported what L.S. told her to Detective Cates.

L.S. stated to her mother that during the middle to end of July, L.S. had met a person who identified himself as "Michael Jensen" on a Facebook application known as "YoVille." "YoVille" is a Facebook application on which users can chat with each other regardless of

Facebook friend status. After L.S. chatted with “Michael Jensen” for a short time, he asked L.S. to speak with him via the online chat program MSN Messenger and gave L.S. a contact name of blondboy4@live.dk that he would be using. L.S. then got onto MSN messenger and began a chat conversation with user “Michael Jensen.” The user stated that he was located in Denmark.

All of L.S.’s online interactions occurred while L.S. was using a computer in Buchanan County, Missouri.

After speaking with “Michael Jensen” for a short time L.S. activated the webcam on the computer she was using and took off all of her clothing. L.S. stated that she then masturbated in view of the webcam at Michael Jensens’s direction. L.S. stated this webcam conversation lasted approximately 25 minutes. L.S. stated that she deactivated the webcam and ended the conversation when the male subject activated his own webcam and began masturbating. The male did not show his face at that time.

In the following days L.S. received multiple emails from blondboy4@live.dk requesting that she again get on webcam with him. After L.S. refused multiple times, blondboy4@live.dk stated that he had recorded the webcam session and that he was going to upload it onto the internet where other people could see it. L.S. then began receiving email messages from user [laura.matthews202@hotmail.com](mailto:laura.matthews202@hotmail.com). Laura Matthews’s email messages contained images that appear to be still captures from the webcam session with blondboy4@live.dk, as well as a 5 minute and 47 second video clip of the same. L.S. also began receiving Facebook messages from a user profile named “Laura Matthews” containing the same and similar images. More specifically:

On July 20, 2010, at 3:02 p.m. CDT (13:02 PDT) user [laura.matthews202@hotmail.com](mailto:laura.matthews202@hotmail.com) sent an email to L.S. that contained a 5 minute and 47 second excerpt from the webcam video produced at the behest of user Michael Jensen.” This excerpt included close-up images of L.S.’s naked vagina. The [laura.matthews@hotmail.com](mailto:laura.matthews@hotmail.com) email address was first registered on July 20, 2010, at 12:58 PDT from IP address 87.56.9.122. On July 20, 2010 from 13:08 PDT until 13:12 PDT, Kai Lundstrom was logged in to his actual Facebook account from IP 87.56.9.122.

On August 14, 2010, Detective Cates obtained Facebook login information from L.S.’s mother for the mother’s personal account as well as the account of L.S. Detective Cates also received permission to view the accounts. Upon logging in to L.S.’s Facebook account, Detective Cates went to the messages section where he identified messages from several users who had either sent images to the account that were taken from the webcam session, requested sexual contact, or had transmitted nude images of L.S. Detective Cates again logged into the account on August 15, 2010, and identified several more user profiles that had sent messages.

Pursuant to a search warrant obtained on September 1, 2010 from U.S. Magistrate Robert E. Larsen in the Western District of Missouri (#10-SW-0124), Facebook provided the content and login information of those user accounts to law enforcement on September 1 and 2, 2010, some of which are described below:

Laura Matthews, Facebook ID 100001302506064. This was one of four “Laura Matthews” profiles, which on August 1, 2010, sent a still image taken from the minor’s webcam session to L.S.’s Facebook account, and threatened to disseminate images on the internet. L.S. is nude in the image. The message was sent from IP address 87.56.9.122<sup>1</sup> and stated:

---

<sup>1</sup> According to <http://centralops.net>, IP 87.56.9.122 resolves to TDC/teledenmark, which is a mobile phone carrier whose website notes that it carries the iPhone.

I have 56 pictures and a video of you. The pictures are from the video and this one is just a free sample. If you don't want me to post everything on the internet, then write back to me on Facebook or on my mail [laura.matthews202@hotmail.com](mailto:laura.matthews202@hotmail.com). Then maybe we can find a way to prevent me from making everything public. I could also send them to your Facebook friends?? Maybe...

User Laura Matthews, Facebook ID 100001302506064 also sent a Facebook message on August 13, 2010, to a friend of L.S., from IP address 87.56.9.122, which demanded a webcam session with L.S. or L.S.'s friend, or the user would continue to distribute images of L.S.

User Laura Matthews, Facebook ID 100001413984616, another "Laura Matthews" profile, on August 14 and 15, 2010, sent messages to L.S.'s Facebook account, again from IP address 87.56.9.122, describing how many times the pictures and video of the minor victim had already been downloaded by others, taunting the minor victim about how she may be recognized by others who had viewed the images, and threatening to continue to disseminate images of the minor victim. The user stated that his previous page had been deleted, but that he had simply made a new page, which he would continue to do if L.S. reported him. The user also stated: "14 hours after your video was put on the servers, it has been downloaded almost 900 times and the 56 pictures almost 600 times . . . . Think of this: If you meet someone in the street and he smiles and maybe giggles a bit, it is not because you look funny - but maybe he enjoyed your video . . . you have to realize that you are on the internet forever. Even 10 years from now you can still be found - and enjoyed."

Facebook information revealed approximately seven (7) additional accounts which had sent messages to L.S. on August 15, 2010 from IP address 87.56.9.122, saying the senders had

seen portions of the webcam session on the Internet. Some of the persons asked to have sexual activity with the victim. Some of the messages threatened the victim with forcible sexual activity or other violence.

One user from the account of Shannon Masterson, Facebook ID 100001467925879, sent a message to L.S.'s Facebook account on August 15, 2010, from IP address 87.56.9.122, transmitting images of child pornography taken from the webcam images of the minor victim. This message requested sexual activity from the minor victim, and threatened physical harm to the minor victim during the course of sexual activity.

Detective Cates obtained L.S.'s e-mail login information from the mother and permission to access this account freely. Detective Cates also obtained permission to utilize the victim's accounts in an undercover manner in order to determine the identity of the suspect. Between August 17 and August 19, 2010, Detective Cates had limited email contact with the suspect at the suspect email address laura.matthews202@hotmail.com. During the course of their correspondence the suspect stated that he had created a new Facebook profile under the name "Layne Lauren" and requested that Detective Cates (posing as the minor victim) become friends with the suspect on the minor victim's Facebook account. The suspect advised that the express purpose of this Facebook profile was so the suspect and Detective Cates (posing as the minor victim) could communicate privately outside of e-mail. The profile information for that account is as follows: Layne Lauren, Facebook IDC100001499640695, registered by ["layneandlauren@live.dk."](mailto:layneandlauren@live.dk) The user of the account initially logged into that account from IP address 87.56.9.122.

The suspect sent several messages from the “Layne Lauren” profile to the minor victim’s Facebook profile on August 17 and 19, 2010. In those messages the suspect requested that Detective Cates (posing as the minor victim) remove the wall tag stating that the minor victim had “friended” the profile from her wall. The “wall tag” stating that the minor victim had “friended” the suspect’s “Layne Lauren” account would allow all of the minor victim’s friends to view the fact that the minor victim had “friended” that user. On August 19, 2010 the suspect stated that he was going on vacation first thing in the morning of the 20<sup>th</sup>, and would not be back from vacation until September 7<sup>th</sup> or 8<sup>th</sup>. The suspect did not specify where he was vacationing.

On August 31, 2010, Facebook responded to a subpoena seeking user information for the Facebook accounts noted above, as well as those accounts associated by IP address or other identifying information with those Facebook accounts, including: 100001440745539 registered by [laura.matthews222@hotmail.com](mailto:laura.matthews222@hotmail.com); 100001417797338 registered by [laura.matthews333@live.dk](mailto:laura.matthews333@live.dk); and 100001061868355 registered by [blondboy4@live.dk](mailto:blondboy4@live.dk). 15 Facebook accounts were associated by IP addresses with the user who enticed L.S. to engage in sexually explicit activity and transported/distributed images of it. A review of the IP login records for those accounts reveals that the accounts were logged into consistently from approximately four IP addresses which are located in Denmark.

Those associated accounts include account number 1358484853, which was registered at Facebook using the email “[kai.lundstroem@mail.dk](mailto:kai.lundstroem@mail.dk).” The mail server “mail.dk” is located in Denmark. The user name associated with that Facebook account is Kai Lundstroem. User information for that Facebook account lists a name of Kai Lundstroem, hometown of Aarhus, Denmark, birthdate 3/9/50, current employee of Randers Kommune, current job IT consultant,



and a current address of Randers, Denmark. The associated Facebook accounts also include the account for “Layne Lauren,” which the suspect set up on August 17, 2010, in order to communicate directly with the victim.

Facebook provided a log of IP addresses used to log into the associated Facebook accounts, including account number 1358484853 registered by “[kai.lundstrom@mail.dk](mailto:kai.lundstrom@mail.dk).” From June of 2010 until August 21, 2010, the user of account number 1358484853 logged in from approximately three different IP addresses, all of which are located in Denmark. For example, on August 15, 2010, the user of account number 1358484853 registered to Kai Lundstrom logged into that Facebook account from IP address 87.56.9.122, which is located in Denmark. On August 17, 18, and 19, 2010, the user of Facebook account number 100001499640695, registered to “Layne Lauren”, logged into that Facebook account from the same IP address. As noted above, numerous messages were sent to the minor victim from the associated Facebook accounts from that same IP address.

Beginning on August 25, 2010, however, the user of account number 1358484853 registered to Kai Lundstrom logged in from IP address 24.184.96.227. An internet search determined that the IP address 24.184.96.227 belongs to Optimum Online (Cablevision Systems) and is located in New York State. On August 31, 2010, Optimum Online responded to a subpoena regarding IP address 24.184.96.227, stating that it was registered to “Anne Merhling” at 3 Smith Lane, Stonybrook, NY, 11790.

The user of Facebook account number 1358484853 registered to Kai Lundstroem logged into that account multiple times from IP address 24.184.96.227 on August 26, 27, 28, 29, and 31. During that time period, the user of Facebook account number 1358484853 registered to Kai

Lundstroem did not log into that account from any other IP address. In addition, the user of account number 100001499640695, registered to “Layne Lauren” –the account set up by the suspect on August 17, 2010, specifically to communicate with the victim–also logged into that Facebook account from IP address 24.184.96.227 on August 31, 2010.

On September 1, 2010, Microsoft responded to a subpoena regarding the email address: [laura.matthews202@hotmail.com](mailto:laura.matthews202@hotmail.com), stating that on August 26 and August 31, 2010, the user of that email account logged into the account from IP address 24.184.96.227, which is registered to 3 Smith Lane, Stony Brook, NY. As noted above, the user of that email account had previously sent emails to L.S. that contain images that appear to be still captures from the webcam session with [blondboy4@live.kd](mailto:blondboy4@live.kd), as well as a 5 minute and 47 second video clip of the same.

An IP Connection Table, which is marked as Attachment A and is incorporated by this reference to this Statement of Probable Cause, summarizes information obtained from Facebook and Microsoft of dates and originating IP addresses for the Layne Lauren Facebook account (registered by “[layneandlaren@live.dk](mailto:layneandlaren@live.dk)”, some of the Laura Matthews accounts, and the Facebook account registered by “[kai.lundstrom@mail.dk](mailto:kai.lundstrom@mail.dk).”

Homeland Security records indicate that KAI LUNDSTROEM PEDERSEN, d/o/b/ 3/9/50, entered the United States on a Danish passport on August 23, 2010, at 12:09 a.m. KAI LUNDSTROEM PEDERSEN stated on his I-94 form an intended place of stay of 3 Smith Lane, Stony Brook, NY, and listed email addresses of [kai.lundstroem@mail.dk](mailto:kai.lundstroem@mail.dk) and [emehrling@hotmail.com](mailto:emehrling@hotmail.com).

In his airline reservation data, a point of contact listed was Elizabeth Mehrling, 107 Grand Canyon Rd., Stanley, NC, 28164. On September 1, 2010, a law enforcement officer

witnessed a Jeep automobile in the driveway of 3 Smith Lane, Stony Brook, NY, with North Carolina license plates that is registered to Elizabeth Anne Mehrling. Both “Lise” Mehrling and Anne Mehrling are listed as friends on Kai Lundstroem’s Facebook account. “Lise” Mehrling’s Facebook page lists a hometown of Stony Brook, NY and a current city of Charlotte, North Carolina.

FURTHER AFFIANT SAITH NOT.

/s/ James D. Kanatzar

Special Agent James D. Kanatzar  
Homeland Security Investigations, ICE

Subscribe and sworn to me the 3rd day September, 2010

/s/ Robert E. Larsen

United States Magistrate Judge  
Western District of Missouri  
Kansas City, Missouri

Attachment A

	<a href="mailto:layneandlauren@live.dk">layneandlauren@live.dk</a>	<a href="mailto:laura.matthews202@hotmail.com">laura.matthews202@hotmail.com</a>	Facebook 1358484853** Kai Lundstroem
Date		7/20/10	7/20/10
Time (PDT)		1258 (registered); 2353	1308-1312; 2308-2400
IP		87.56.9.122; 195.249.106.2	87.56.9.122; 195.249.106.2
Date		7/21/10	7/21/10
Time (PDT)		407	0000-0622
IP		195.249.106.2	195.249.106.2
Date		7/21/10	7/21/10
Time (PDT)		806	808-1427
IP		87.56.9.122*	78.156.125.137
Date		7/21/10	7/21/10
Time (PDT)		832	808-1427
IP		78.156.125.137	78.156.125.137
Date		7/21/10	7/21/10
Time (PDT)		1348	808-1427
IP		87.56.9.122	78.156.125.137
Date		7/22/10	7/22/10
Time (PDT)		109	0000-0601
IP		195.249.106.2	195.249.106.2
Date		7/23/10	7/23/10
Time (PDT)		0045	0030-0509
IP		195.249.106.2	195.249.106.2
Date		7/27/10	7/27/10
Time (PDT)		818	807-1353
IP		87.56.9.122	78.156.125.137
Date		7/30/10	7/30/10
Time (PDT)		2320	2349
IP		87.56.9.122	78.156.125.137
Date		8/6/10	8/6/10
Time (PDT)		833	830-836
IP		87.56.9.122	78.156.125.137

	<a href="mailto:layneandlauren@live.dk">layneandlauren@live.dk</a>	<a href="mailto:laura.matthews202@hotmail.com">laura.matthews202@hotmail.com</a>	Facebook 1358484853** Kai Lundstroem
Date		8/8/10	8/8/10
Time (PDT)		826	826
IP		87.56.9.122	78.156.125.137
Date		8/9/10	8/9/10
Time (PDT)		826;	759-1418
IP		87.56.9.122	78.156.125.137
Date		8/11/10	8/11/10
Time (PDT)		2323	2253-2316
IP		195.249.106.2	195.249.106.2
Date		8/12/10	8/12/10
Time (PDT)		0045-616 (17x)	0047-0629
IP		195.249.106.2	195.249.106.2
Date		8/12/10	8/12/10
Time (PDT)		2138	2141-2142
IP		78.156.125.137	78.156.125.137
Date		8/12/10	8/12/10
Time (PDT)		2318,2336	2325-2329
IP		195.249.106.2	195.249.106.2
Date		8/13/10	8/13/10
Time (PDT)		0047-0527 (11x)	0048-0526
IP		195.249.106.2	195.249.106.2
Date		08/15/10	08/15/10
Time (PDT)		2327	2330-2400+
IP		195.249.106.2	195.249.106.2
Date		8/15/10	8/15/10
Time (PDT)		2135	2130-2132
IP		87.56.9.122	87.56.9.122
Date		8/15/10	8/15/10
Time (PDT)		2327	2330-2400
IP		195.249.106.2	195.249.106.2
Date		8/16/10	8/16/10
Time (PDT)		135-606 (7x)	0000-0625
IP		195.249.106.2	195.249.106.2

	<a href="mailto:layneandlauren@live.dk">layneandlauren@live.dk</a>	<a href="mailto:laura.matthews202@hotmail.com">laura.matthews202@hotmail.com</a>	Facebook 1358484853** Kai Lundstroem
Date		8/16/10	8/16/10
Time (PDT)		818,846,927	0853-1437
IP		87.56.9.122	78.156.125.139
Date	8/17/10	8/17/10	8/17/10
Time (PDT)	1022 (registered)	1004	0803-1523
IP	87.56.9.122	87.56.9.122	78.156.125.139*
Date	8/19/10	8/19/10	8/19/10
Time (PDT)	01:58	01:57	00:00-06:04
IP	195.249.106.2	195.249.106.2	195.249.106.2
Date	8/20/10	8/20/10	8/20/10
Time (PDT)	0336	0336	0000-0526
IP	195.249.106.2	195.249.106.2	195.249.106.2
Date	8/26/10	8/26/10	8/26/10
Time (PDT)	1044	1043	1046-1101
IP	24.184.96.227	24.184.96.227	24.184.96.227
Date	8/31/10	8/31/10	8/31/10
Time (PDT)	0924	0919	1629 GMT? (929 PDT)
IP	24.184.96.227	24.184.96.227	24.184.96.227

IP 78.156.125.137 resolves to EMNET and is described as a “residential users” account according to <http://centralops.net>

IP 195.249.106.2 resolves to Randers-Kommune-Net according to centralops. According to the Randers Kommune website, [www.randers.dk](http://www.randers.dk), Kai Lundstroem is an employee of that company.

IP 87.56.9.122 resolves to TDC/teledenmark according to centralops, which is a mobile phone carrier whose website notes that it carries the Iphone.

\*There are multiple occasions where the user is logged onto an email account at IP 87.56.9.122 and to Kai Lundstrom’s facebook account at IP 78.156.125.139. On July 20, 2010, the user was logged into the same Facebook account from IP 87.56.9.122 at 13:12:01 PDT and then from IP 78.156.125.139 at 13:12:23 PDT, suggesting he is able to switch between those IP addresses in less than 30 seconds. That may explain how he could be logged into his Facebook account at IP 78.156.125.139 and the other email accounts at nearly the same time at IP 87.56.9.122. That is also consistent with IP 87.56.9.122 being a mobile device.

\*\*This is the account registered by “kai.lundstrom@mail.dk.”