

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

Kevin Michael Hutchinson)

Case No.)

6:18-mj- 1263)

Defendant(s)

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(s) of April 19, 2018 in the county of Orange in the Middle District of Florida, the defendant(s) violated:

Code Section 18 U.S.C. § 2252A(a)(2) Offense Description Receipt of child pornography

This criminal complaint is based on these facts:

Continued on the attached sheet.

Complainant's signature Special Agent Ryan Egglund Printed name and title

Sworn to before me and signed in my presence.

Date: 4/20/2018

Judge's signature

City and state: Orlando, FL

Daniel C. Irick, U.S. Magistrate Judge Printed name and title

STATE OF FLORIDA

CASE NO. 6:18-mj- 1263

COUNTY OF ORANGE

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ryan Egglund, after being duly sworn, depose and state:

1. I am a Special Agent (SA) employed with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) and have been so employed since October 2009. I am currently assigned to the Orlando, Florida office of HSI, and my duties include the enforcement of federal criminal statutes including but not limited to Titles 8, 18, 19, 21, and 31 of the United States Code. I am a law enforcement officer of the United States within the meaning of 19 U.S.C. § 1401(i), and am empowered to investigate and make arrests for violations of United States criminal laws within the meaning of 18 U.S.C. § 2510(7).

2. My formal education includes a Bachelor's degree in Business Administration and a Master's degree in Business Administration from the University of North Florida. Through numerous advanced law enforcement-training programs, I have received specialized training in the investigations of sex crimes, child exploitation, child pornography, and computer crimes. I have participated in training courses for the investigation and enforcement of child pornography laws in which computers are used as the means for

receiving, transmitting, and storing child pornography. I have been involved in investigations involving child pornography, the creation of child pornography, and online solicitation/enticement of minors. I have participated in investigations of persons suspected of violating federal child pornography laws, including violations of 18 U.S.C. §§ 2251, 2252 and 2252A.

Additionally, I have authored and participated in the execution of search warrants involving searches and seizures of computers, computer equipment, software, and electronically stored information.

3. This affidavit is submitted in support of a criminal complaint. As set forth in more detail below, I have probable cause to believe that KEVIN MICHAEL HUTCHINSON knowingly received child pornography, in interstate commerce, in violation of 18 U.S.C. §§ 2252A(a)(2).

4. I make this affidavit from personal knowledge based on my participation in this investigation, information from other criminal investigators, information from law enforcement officers, information from agency reports, and the review of documents provided to me by these witnesses and law enforcement officers. Because this affidavit is being submitted for the limited purpose of a criminal complaint, I have not set forth each and every fact learned during the course of this investigation.

STATUTORY AUTHORITY

5. Title 18, United States Code, Section 2252A, prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, or possessing any child pornography, as defined in 18 U.S.C. § 2256(8), using any means or facility of interstate commerce, or in or affecting interstate commerce.

DETAILS OF THE INVESTIGATION

6. KIK Interactive Inc.¹ has developed a system to detect if their service may have been used to commit a child pornography and/or child abuse offense, specifically the offense of transmitting child pornography or child abuse contrary to subsection 163.1[d] of the Criminal Code of Canada. In Canada, there is currently legislation in effect that requires all electronic service providers to report child pornography offenses when they are discovered. KIK, in partnership with law enforcement, uses hash-matching

¹ KIK Interactive Inc. is a Waterloo based technology company. KIK is a social networking website developed in order to allow individuals with similar interests to connect online and in person. In order to use the website a user requests a username and uses that username to communicate with other users. KIK Messenger is a mobile cellular telephone application that allows users to utilize KIK on their mobile devices. Once the application is downloaded and installed, the user must register the account by using their username and an email address. After completing the registration process, users can communicate online via text and/or chat group and send/receive pictures and videos.

technologies (similar to SHA-1 and ED2K described above) to moderate images being transferred between KIK users and groups. The hash values of known child pornography files being used by KIK have been provided by the Royal Canadian Mounted Police (RCMP) Canadian Police Center for Missing and Exploited Children (CPCMEC). This hash database is based on images that have been manually reviewed for content and determined as meeting the criteria of what is known as 'Interpol Baseline Hash' or IBH. Interpol has set out strict criteria to identify certain media as 'the worst of the worst' with regards to child exploitation. Inclusion on this list requires a depiction of a real child (no anime, CGI, etc.), estimated to be under the age of 13, clearly engaged in an explicit sexual act, or the camera focus must be on the anus or sexual organs. Files meeting these strict criteria would qualify as child pornography as defined above.

7. In January 2018, HSI Orlando received information from the RCMP through the HSI Ottawa Attaché regarding several KIK accounts suspected of being involved in child exploitation in some way. Included in this list was the username john_easley360. KIK observed that john_easley360 sent an image file with a SHA-1 value matching a SHA-1 value in their list of known child pornography values on December 26, 2017, at 09:33:21 UTC and again on December 26, 2017, at 23:50:22 UTC. The user behind the

john_easley360 username was connected to KIK through the IP address 69.244.252.187 on both occasions. KIK provided a log of the child pornography SHA-1 observed to be sent by john_easley360, user information maintained by KIK on john_easley360, and KIK connection logs of john_easley360.

8. I reviewed the image provided, which depicts a prepubescent child performing oral sex on an adult male. The image is taken from the vantage point of the adult male as he lays on his back. The child is positioned between the adult male's legs looking up at the camera. The adult male's penis is in the child's mouth and the child's hand is wrapped around the base of the penis.

9. The following subscriber details were provided by KIK for the user john_easley360:

First Name:	John
Last Name:	Easley
Email:	john.easley[REDACTED].com
Username:	john_easley360
Date of Birth:	xx-xx-1982 ²
Device/Model:	Android Motorola XT1052
Registration:	July 24, 2017 at 22:11 (UTC)
IP Address	69.244.252.187

² This birthdate is different from the actual birthdate of Kevin Michael Hutchinson listed in paragraph 28.

10. There were a number of IP addresses included in the logs received from KIK for user john_easley360. However, on various dates from November 29, 2017 through December 27, 2017, john_easley360 was connected through IP address 69.244.252.187 (associated with Comcast) and other IP addresses associated with Sprint PCS.

11. The RCMP and/or HSI Ottawa Attaché also forwarded the investigative materials to me, which included the image sent by KIK user john_easley360, mentioned previously. I have viewed the image, SHA-1 equal to 69741D4AE2FE4E7C0B15F56393CD4755B2ADC7A7, and confirmed that it is child pornography. John_easley360 sent this image on December 26, 2017, at 09:33:21 UTC and again on December 26, 2017, at 23:50:22 UTC. This file is an image of a young child (approximately five to ten years of age) performing oral sex on an adult male.

12. According to records I obtained from Comcast, the subscriber information for IP address 69.244.252.187 on December 26, 2017, at 09:33:21 UTC and again on December 26, 2017 at 23:50:22 UTC (the times the file was sent by john_easley360 from IP address 69.244.252.187) was as follows:

Name:	Kevin Michael Hutchinson
Billing and Service Address:	[REDACTED] Orlando, FL 32807
Home Phone:	[REDACTED]

E-mail User IDs: kevhutch[REDACTED].net

13. On February 23, 2018, I conducted a search of the Florida Department of Motor Vehicles (DMV) Driver and Vehicle Information Database (DAVID) for the address [REDACTED], Orlando, FL 32807. As a result, I learned that Florida driver license #H***-***-**-323-0 was issued to Kevin Michael HUTCHINSON (DOB: [REDACTED] xx, 19xx) on May 30, 2014. The address listed for HUTCHINSON as of January 5, 2017, is [REDACTED] Orlando, FL 32807. HUTCHINSON has registered a 2012 white Toyota pickup truck with Florida license plate [REDACTED].

14. Surveillance was conducted at [REDACTED], Orlando, FL 32807, on various dates in March 2018. A white Toyota Tacoma bearing Florida license plate [REDACTED] was observed parked in front of the building. Surveillance and records checks have not shown anyone else residing at [REDACTED] Orlando, FL 32807, other than HUTCHINSON. In addition, I have conducted a search for unprotected WIFI signals in the vicinity of [REDACTED] Orlando, FL 32807. All WiFi signals were password protected.

15. On April 17, 2018, United States Magistrate Judge Daniel C. Irick authorized the issuance of a search warrant for HUTCHINSON's residence. On April 19, 2018, agents executed the search warrant.

16. On April 19, 2018, at approximately 11:30 a.m., HSI Special Agents Ryan Egglund, Ken McClenahan, and Joe Grey knocked on the door of [REDACTED] Orlando, FL 32807 and spoke with HUTCHINSON. He said that he was home alone on December 26, 2017. At this point HUTCHINSON stepped outside the residence to answer additional questions.

17. Initially, HUTCHINSON denied having a KIK account and denied any activity related to child pornography. HUTCHINSON claimed that his laptop computer had been broken for over a year, and he conducted all of his online activity via his cell phone. When agents asked if HUTCHINSON would allow them to review his cell phone, HUTCHINSON allowed the agents to enter the apartment with him where he went into his bedroom and retrieved his cell phone from the bed. HUTCHINSON then unlocked the phone for Special Agent McClenahan. At that time, Special Agent McClenahan could see that the KIK Messenger application was located on HUTCHINSON's iTunes cloud account, though HUTCHINSON denied having used the KIK Messenger application.

18. At that point, I interrupted the interview to read HUTCHINSON his *Miranda* rights from ICE Form 73-025 (09/09). HUTCHINSON said that he understood his rights and continued to cooperate with us. A short time later we informed HUTCHINSON that law enforcement would be executing a federal search warrant of his residence. Later, HUTCHINSON admitted that his laptop computer was not broken. HUTCHINSON said that he used a program called "BlueStacks" to access mobile applications like KIK via his computer.

19. As the conversation progressed, HUTCHINSON said that he used the TOR browser to search for and download child pornography. He said that he found a website where he could download file folders filled with images and videos of child pornography. He said that he would then categorize the child pornography files into different file folders to organize his collection.

20. Florida Department of Law Enforcement Special Agent Tim Doucette conducted a forensic preview of the laptop computer identified by HUTCHINSON as his personal laptop computer. Special Agent Doucette found over 7 gigabytes of suspected child pornography including two file folders with files downloaded and accessed on April 19, 2018.

21. Special Agent Doucette showed me the two file folders referenced below in paragraphs 22 and 23 that were labeled “Sammy” and “Tara.” Special Agent Doucette indicated that both were downloaded, i.e., received on April 19, 2018.

22. The first file folder, “Sammy” contains 160 image files, which appear to be child pornography. Special Agent Doucette showed me one of the files (petit_11111_2364.jpg). This file is an image of a 6-8 year old Caucasian female child performing oral sex on an adult male, which I believe constitutes child pornography.

23. The second file folder “Tara” contains several video files. Special Agent Doucette played one of the video files for me (the file name was as follows: “f15b2cd2225c5ad4fb5307acd297d135-anal girl man oral thc sound tara.avi”). This video has sound and depicts a 4-6 year old Caucasian female performing oral sex on an adult male. The child is then anally penetrated by an adult male penis before performing oral sex on the adult male again. I also believe that this video constitutes child pornography.

24. Special Agent Joe Grey asked HUTCHINSON to accompany him to the parking lot to view the files in question, which were being analyzed by Special Agent Doucette. While looking at the Special Agent Doucette’s computer screen which was depicting the file structure of HUTCHINSON’s

laptop hard drive, HUTCHINSON directed Special Agent Grey to the “Sammy” file and indicated that he received that file early that day (April 19, 2018) and that he had viewed the contents of the file at that time to verify that it contained child pornography. HUTCHINSON also directed Special Agent Grey to the “Tara” file and advised that he had also received that file early that morning (April 19, 2018) and had also viewed the contents of the file at that time to verify the file contained child pornography.


25. During the interview, HUTCHINSON also stated that there would be a file found on his laptop computer called “Guide.” HUTCHINSON indicated that this file would contain instructions on how to be a pedophile.

26. During the interview Special Agent Grey asked HUTCHINSON if he swore that everything he told agents was the truth. HUTCHINSON raised his right hand and swore that he had told the truth. HUTCHINSON also agreed that agents had not coerced him into making any statements, and that he had made the statements voluntarily. HUTCHINSON stated that he had read *Miranda* Rights to individuals a number of times, and that he understood the rights and understood that he made his statement voluntarily after he was read his *Miranda* Rights by me earlier that morning.

CONCLUSION


27. Based on the above, I have probable cause to believe that HUTCHINSON knowingly received child pornography that was produced using materials that were mailed, shipped or transported in interstate and foreign commerce, and using a facility of interstate commerce, in violation of 18 U.S.C. § 2252A(a)(2).

Affiant further sayeth naught.



Ryan G. Egglund, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me
This 20th day of April, 2018.



Honorable Daniel C. Irick
United States Magistrate Judge