

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

DAVID HUNTLEY,

Case:2:15-mj-30123

Judge: Unassigned,

Filed: 03-16-2015 At 12:06 PM

RE: DAVID HUNTLEY (EOB)

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 1990 to March 13, 2015, in the county of Monroe
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. Section 2252A(a)(2)
18 U.S.C. Section 2252A(a)(5)(B)

Offense Description

Distribution and receipt of child pornography
possession of child pornography

This criminal complaint is based on these facts:
See attached affidavit.

FILED
MAR 16 2015
CLERK'S OFFICE
U.S. DISTRICT COURT



Continued on the attached sheet.


Complainant's signature

Special Agent Lisa Keith, DHS/HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/16/15


Judge's signature

City and state: Detroit, Michigan

DAVID GRAND, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Lisa Keith, being first duly sworn, state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), in Detroit, Michigan. I have been employed as a Special Agent since August 2007. I am currently assigned to the Michigan Internet Crimes Against Children task force ("ICAC"). The Michigan ICAC is a cooperative effort of members of the Michigan State Police, local Michigan Police Departments and the Federal Government, whose purpose is to enforce criminal statutes involving the sexual exploitation of children. I have received training from the U.S. Department of Justice in child exploitation investigations and online undercover investigations. I have conducted over fifty investigations relating to child exploitation and have assisted HSI Detroit Cybercrimes Group in numerous others.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for David HUNTLEY for the distribution, receipt and possession of child pornography in violation of Title 18, United States Code, Sections 2252A(a)(2), and 2252A(a)(5)(B).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law

enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation.

II. BACKGROUND OF INVESTIGATION

4. For purposes of understanding this investigation, the following describes how digital files are shared among people, across the world, using what is known as a Peer-to-Peer file sharing (P2P) network. Peer-to-Peer file sharing allows people using P2P software to download and share files with other P2P users using the same or compatible P2P software. Peer-to-Peer software is readily available on the Internet and often free to download. Internet connected devices such as computers, tablets and smartphones running P2P software form a P2P network allowing for these computers to communicate with each other, as if they were directly attached. When a P2P program is installed and running, the user will be able to download files from other users on the network and share files from their device with other network users.

5. Users of the P2P network wishing to share new content will use a program to create a "torrent" file for the file or group of files they wish to share. A torrent file is a small file that contains information about the file(s) and provides a method for a user to download the file(s) referenced in the torrent from other P2P users.

Torrent files are typically found as the result of keyword searches on Internet sites that host or link to them. Torrent files may be referenced by their "infohash," which uniquely identifies the torrent based on the file(s) associated with the torrent file.

6. To download files from other users on the P2P network, a user typically obtains a torrent file. The P2P software processes the information in the torrent file and locates devices on the network sharing all or parts of the actual file or files being sought. The download of the content referenced in the torrent is achieved after the requesting computer and the sharing computer(s) directly connect to each other through the Internet using the P2P software.

7. During this investigation, Detective Trooper Sharon McDonald, a member of the Southeast Michigan ICAC, utilized a P2P client software program to identify other P2P computers sharing files via this network. Detective McDonald connected to the network, through the Internet, which functions as a means and facility of interstate and foreign commerce. This P2P client software reports the Internet Protocol (IP) address, which is a numerical address unique to every modem used by any computer connected to the Internet.

8. On or about January 12 and 13, 2015, Detective McDonald was running specialized software in an effort to identify users on a P2P file sharing network sharing child pornography. Detective McDonald directed investigative focus to a

device located at IP address 73.18.34.4, as it was associated to a torrent file containing 609 files, at least one of which had a SHA1 hash value of investigative interest.

9. SHA1, or Secure Hash Algorithm Version 1, is a file encryption method which may be used to produce a unique digital signature of a file. It is computationally infeasible to find two different files that produce the same SHA1 value. A SHA1 hash value can be described as a digital "fingerprint" of a file (usually a picture or video file) that consists of a unique series of letters and numbers. The hash values of at least one of the 609 files referenced above have been previously identified by law enforcement as suspected child pornography or related files.

10. Between January 12, 2015, at 1538 hours, and January 13, 2015, at 0315 hours, Detective McDonald successfully completed a single source download of 609 files that the device at IP address 73.18.34.4 was making available. The device at IP address 73.18.34.4 was the sole candidate for the download, and as such, each file was downloaded directly from this IP address. After the download, the files were reviewed by Detective McDonald, and most depicted children and were either child pornography or child erotica. Many of the files depicted real minor children engaged in sexually explicit conduct, including, but not limited to, the lascivious display of the genital or pubic area.

11. many appeared to depict real minor child engaged in sexually explicit conduct including, but not limited to, the lascivious display of the genital or pubic area.

12. On January 30, 2015, between 0522 hours and 1314 hours, Detective McDonald successfully completed a single source download of the same 609 files that the device at IP address 73.18.34.4 was making available. The following describes some of two of the files downloaded from IP address 73.18.34.4:

Ism-021-...jpg¹ The image depicts a prepubescent female child lying on rocks with an inner tube around her waist. The female child is shown with her legs apart and vagina visible.

Ls-star-016a...jpg The image depicts a prepubescent female child sitting on a branch. The female child is shown with her legs apart and vagina visible.

13. An open source query showed that IP address 73.18.34.4 is administered by Comcast Cable Communications. Comcast Cable Communications identified the subscriber of IP address 73.18.34.4, during the aforementioned download dates and

¹ Portions of the file names have been removed to prevent dissemination of known and identified files of child pornography through public databases where this affidavit may appear.

times, as belonging to David HUNTLEY, with a service address of ***5 Bonner, Monroe, Michigan.

14. Information was obtained from the Michigan Secretary of State operating license records. The records revealed that David HUNTLEY (xx/xx/1963) resided at ***5 Bonner Road, Monroe, Michigan.

15. On March 12, 2015, Detective McDonald, along with the ICAC, executed a search warrant at HUNTLEY's residence on Bonner Road, while HUNTLEY was working at Burger King.

16. During the search, agents/officers located a computer located inside the residence. The computer was operating the BitTorrent/uTorrent P2P program and was actively distributing and receiving child sexually abusive material.

17. During the search, numerous items of electronic media were seized, including: two desktop computers, one Hewlett Packard laptop computer, one network attached storage (NAS) device, four external hard drives, zip drives, thumb drives, 8mm tapes, VHS tapes, DVDs and floppy disks.

18. Surveillance was established at HUNTLEY's place of employment. A traffic stop was conducted by the Michigan State Police (MSP) after HUNTLEY left Burger King. Detective McDonald arrived at the traffic stop and advised HUNTLEY of the search warrant being conducted at his residence. HUNTLEY agreed to meet Detective McDonald at the MSP Monroe Post for an interview.

19. At the MSP Post, HUNTLEY was interviewed by your affiant and Michigan Department of Corrections Agent Jon Larkin. I advised HUNTLEY that he was not under arrest. HUNTLEY voluntarily waived his Miranda rights and consented to an interview. The interview was audio and video recorded. During the interview, HUNTLEY made the following statements:

- a. HUNTLEY has lived at the Bonner Road residence since 1993 and has never had a roommate;
- b. HUNTLEY has been viewing child pornography since approximately 1990;
- c. HUNTLEY has been using P2P software for approximately the last 10 years;
- d. HUNTLEY uses search terms such as "rape" and "preteen" in torrent websites;
- e. HUNTLEY stated that he is in possession of approximately one Terabyte of child pornography images and videos, mostly female;
- f. HUNTLEY views child pornography for stress relief and self-gratification.

20. Later this same day, Detective McDonald continued a consensual interview with HUNTLEY. During this interview, HUNTLEY made the following statements:

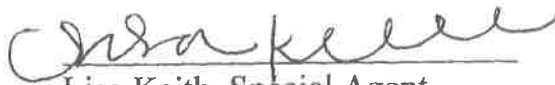
- a. HUNTLEY stated that he is sexually attracted to children who have not yet matured because of their natural scent and that he prefers breasts in the beginning stages of development;
- b. HUNTLEY admitted that he is an opportunist and that he would like to have sexual contact with older girls, ages 14-16, but he has not been given the opportunity. HUNTLEY stated that younger children are more approachable and they also approach him.
- c. HUNTLEY admitted that he drugged his 12 year-old cousin and digitally penetrated her while she was unconscious. He further admitted that he digitally penetrated a 10 year-old girl in a hot tub.

III. CONCLUSION

21. Affiant respectfully submits that there is probable cause to believe that David HUNTLEY distributed, received and possessed child pornography in violation of Title 18, United States Code, Sections 2252A(a)(2), and 2252A(a)(5)(B).

22. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for David HUNTLEY.

Respectfully submitted,



Lisa Keith, Special Agent
Department of Homeland Security
Homeland Security Investigations

Subscribed and sworn to before me
on the 16th day of March, 2015.



HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE