

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Central District of Illinois

FILED

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CLERK OF COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

United States of America)
v.)
Aaron M. Hill)
208 Mary Street, Washington, Illinois)
)
)
)
)
Defendant(s)

Case No. 18 MJ 6076

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 _____ in the county of Tazewell in the
Central District of Illinois, the defendant(s) violated:


<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(2)(A); (b)(1)	knowingly distributed child pornography 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 had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:

See attached Affidavit


Continued on the attached sheet.

s/ Steven Smith


Complainant's signature
Detective Steven Smith, Washington PD
Printed name and title

Sworn to before me and signed in my presence.

Date: 09/13/2018

s/ Jonathan E. Hawley

Judge's signature
Jonathan E. Hawley, U.S. Magistrate Judge
Printed name and title

City and state: Peoria, Illinois

COUNT ONE
(Distribution of Child Pornography)

1. On or about August 8, 2018, in the Central District of Illinois, the defendant,

AARON M. HILL,

knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a male child performing oral sex on an adult male, said digital video was mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT TWO
(Distribution of Child Pornography)

2. On or about August 8, 2018, in the Central District of Illinois, the defendant,

AARON M. HILL,

knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved several male children, but in part, involved a male child performing oral sex on another male child, said digital video was

mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT THREE
(Distribution of Child Pornography)

3. On or about August 14, 2018, in the Central District of Illinois, the defendant,

AARON M. HILL,

knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved an adult male placing his erect penis in a male toddler's mouth, said digital video was mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

AFFIDAVIT

I, Steven C. Smith, being duly sworn on oath state the following:

1. I am a Detective with the Washington, Illinois, Police Department and I have been employed as a police officer since 2003. I am currently assigned as a Task Force Officer (TFO) with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Springfield, Illinois. As part of my responsibilities as an HSI TFO, 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. §§ 2251, 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 various forms of media including computer media. I have received training in the area of peer-to-peer trading of child pornography and child exploitation offenses. I have been the affiant for over 50 search warrants and over 100 state arrest warrants. I have also participated in the execution of numerous state and federal search warrants that were based on alleged child exploitation and/or child pornography offenses.

2. As a Task Force Officer with DHS, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is based upon information I have gained from my investigation, my training and experience, as well as information provided by other law enforcement agents involved in this and other computer crime investigations. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

4. I make this affidavit in support of a criminal complaint and arrest for Aaron Hill (hereinafter referred to as "HILL"). As will be shown below, there is probable cause to believe that HILL received and distributed visual depictions of persons under the age of 18 engaged in sexually explicit conduct (as defined in 18 U.S.C. § 2256) in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

5. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, 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 HILL committed violations of Title 18, United States Code, Section 2252A(a)(2)(A).

RELEVANT STATUTES

5. This investigation concerns alleged violations of 18 U.S.C. § 2252A(a)(2)(A) which prohibits a person from knowingly receiving or distributing, any visual depiction using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means including by computer, or knowingly reproduces any visual depiction for distribution using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or through the mails, if the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and such visual depiction is of such conduct.

PROBABLE CAUSE

CYBERTIPLINE REPORT # 34166525 – TUMBLR

6. I know the following about “Tumblr, Inc.,” (Tumblr) generally:

a. Tumblr the name of an Electronic Service Provider (ESP) that is located in New York, New York. Tumblr is a media network that allows users to create, post, share, and follow digital media at any time from a computer or other electronic storage device, like cellular phones or tablets.

b. To sign up for a Tumblr account, a user must provide an e-mail address, a password and create a username. Tumblr also asks the user to identify their age and agree to a Terms of Service. A user must also complete a task to prove they are not a robot.

c. Once an account is created, a user must select five categories. These categories are general topics, such as fashion, politics, history and education.

d. After creating the account and selecting five categories, a user can post and view items. Users can post videos and images and can comment on other user's posts. Tumblr offers users messaging capabilities, an inbox, an activity tracker, and other items to enhance their experience.

e. Tumblr is accessible on Internet browsers on computers and portable digital devices, including cellular telephones. Tumblr offers applications for portable digital devices. Tumblr also offers browser extensions for Google's Chrome Browser and the Firefox Browser.

7. On July 26, 2018, I received CyberTipline Report # 34166525 from the Illinois Attorney General's Office. Tumblr personnel reported an individual, with the username of "icesex95" had uploaded suspected child pornography files to Tumblr on June 6, 2018 at 16:50:00 UTC. (Note: the CyberTipline Report stated that Tumblr personnel had viewed the uploaded files).

8. Within CyberTipline Report # 34166525, Tumblr personnel provided two digital files of suspected child pornography that were uploaded to the "icesex95" account. I have viewed the files and the descriptions are below:

a. The first file name is: 174467566646.jpg, MD5 Hash Value: a2e9472f5fff7115f7b334df5598333a. This digital image depicts a white male, approximately 4 to 6 years old lying face down. He is positioned with his stomach touching what appears to be a bedspread and he is holding up his left arm in a position to that allows him to rest his head as if he is watching something. The boy is wearing a white undershirt and a pair of white underwear. The underwear is pulled down exposing the child's buttock. Although this image in itself is not child pornography as defined by federal law, this is a known image from an identified child pornography series known as "8kids".

b. The second file name is: 174467566646_0.jpg, MD5 Hash Value: a2e9472f5fff7115f7b334df5598333a. This digital image depicts a white male, approximately 4 to 6 years old laying down. He is positioned with his stomach touching what appears to be a bedspread and he is holding up his left arm in a position to that allows him to rest his head as if he is watching something. The boy is wearing a white undershirt and a pair of white underwear. The underwear is pulled down exposing the child's buttock.

Although this image in itself is not child pornography as defined by federal law, this is a known image from an identified child pornography series known as "8kids".

c. From my training and experience, I am aware that someone who is viewing or posting images within a child pornography series, such as "8kids," is also most likely viewing or possessing the corresponding images containing child pornography.

9. The CyberTipline report from Tumblr also provided information on the user of account associated with "icesex95." The e-mail account for the user is 59915544ma@gmail.com. Also, the user's last IP Address at the time of the CyberTipline Report was 2601:242:8200:b440:2905:386f:19e1:c251. This information was used to further the investigation to identify the user of account associated with "icesex95."

10. On or about July 26, 2018, an inquiry of the American Registry for Internet Numbers (ARIN), revealed this same IP Address, 2601:242:8200:b440:2905:386f:19e1:c251, is registered to Comcast Cable Communications, LLC (Comcast). On or about July 26, 2018, I accessed Maxmind.com, a Geo-location website, and determined that this IP Address, 2601:242:8200:b440:2905:386f:19e1:c251, is registered to the area of Washington, Illinois.

11. Further, on August 14, 2017, Comcast responded to a DHS summons and reported that IP Address 2601:242:8200:b440:2905:386f:19e1:c251 was assigned to Tiffany Doyle at the SUBJECT PREMISES. Comcast reported Tiffany's telephone number as 309-340-8307 and her e-mail address as tiffanyd17@comcast.net. It should be noted that this was the case at the time user icsex95 uploaded the files noted in paragraph 8(a) and 8(b).

CYBERTIPLINE REPORT # 33837307 – INSTAGRAM

12. I know the following about Instagram, generally.

a. Instagram, which is owned by Facebook Inc., is a social media network that allows users to create, post, share, and follow other users at any time from a computer or other electronic storage device, like cellular phones or tablets.

b. Instagram is accessible to users through browsers on computers and other portable digital devices, including cellular phones. Instagram also offers standalone applications for portable digital devices.

c. To sign up for an Instagram account, a user must provide an e-mail address or a telephone number, a password, and create a username.

13. On July 26, 2018, I received CyberTipline Report # 33837307 from the Illinois Attorney General's Office, in which Instagram personnel reported an individual, with the username of "59915544ma" had uploaded a suspected child

pornography file to Instagram on May 31, 2018 at 16:05:10 UTC. (Note: the CyberTipline Report stated that Instagram personnel had viewed the uploaded file).

14. Within CyberTipline Report # 33837307, Instagram personnel provided a single digital file of suspected child pornography that the user uploaded to the 59915544ma account. I have viewed the file and the description is below:

a. The file name is:

9u57g6vn2dk4ss4032343968_434512646997428_8008788880780165120_n.jpg

This file depicts a female approximately 11 to 13 years old lying on a table.

The female is completely nude. The female is bound with tape on her wrist and ankles. The female has a red in color item inserted in her anus.

15. The CyberTipline report from Instagram also provided the email account associated with 59915544ma. Specifically, the user's e-mail address is 59915544ma@gmail.com.

16. On August 2, 2018, to further my investigation on CyberTipline Report # 33837307, I submitted a search warrant 18-MJ-6067 issued by the United States District Court for the Central District of Illinois regarding Instagram user 59915544ma to Facebook, INC.

17. On August 2, 2018, Facebook, INC. responded by providing specific account information for Instagram user 59915544ma. Specifically, the user listed his first name as Aaron, and registered the account on January 21, 2018.

a. Additionally, Facebook, INC. included one (1) media file that was linked to the account. The file is a video that depicts a white male masturbating, and his face is visible.

b. I compared the white male's face in this file with a known photo of Aaron M. Hill (DOB: 05/23/1995) from his public Facebook page. Based on this comparison, I believed this white male associated with Instagram user 59915544ma is Aaron M. Hill (DOB: 05/23/1995) of Washington, Illinois.

c. Facebook, INC. also provided a file named ncmec_reports_2094006607294348.jpg. This is the file, noted in paragraph 14(a), which Instagram reported to NCMEC in CyberTipline Report # 33837307. Based on my observation, this is child pornography as defined by Title 18, U.S.C. § 2252A.

CYBERTIPLINE REPORT # 36642691 – TUMBLR

18. On August 8, 2018, I received CyberTipline Report # 36642691 from the Illinois Attorney General's Office. Tumblr personnel reported an individual, with the username of "icewolfperv" had uploaded suspected child pornography files

to Tumblr on July 15, 2018 at 12:17:00 UTC. (Note: the CyberTipline Report stated that Tumblr personnel had viewed the uploaded files).

19. As part of CyberTipline Report # 36642691 Tumblr personnel provided seven digital files that were uploaded to the "icewolfperv" account. I have viewed each of the seven files and determined one file is child pornography.

That file is described below by its name, MD5 hash value and description:

a. The file name is: conversation_185405741_1531657047945.jpg, MD5 Hash Value: C3BD9217F57E4DEDB3375C023E74CB4B. This digital image depicts a male, approximately 6 to 8 years old performing oral sex on an adult male. The adult male's penis is erect in this image.

20. This CyberTipline report from Tumblr also included specific account information for the user associated with "icewolfperv" account. Specifically, the e-mail account for the user is 5544nora@gmail.com. It should be noted that this Tumblr account and email account have certain common elements with other evidence already discussed.

a. The numbers "5544" are present in this email account 5544nora@gmail.com associated with Tumblr user "icewolfperv;" and, Instagram user 59915544ma. Also the gmail account associated with Tumblr user "icesex95" is 59915544ma@gmail.com

b. Additionally, the word "ice" is found in both Tumblr user "icewolfperv;" and, with Tumblr user "icesex95."

c. The numbers "95" in Tumblr user "icesex95" also corresponds to Aaron Hill's year of birth - 1995.

GOOGLE, INC. RESPONSE TO SEARCH WARRANT 18-MJ-6067

21. As noted above, the same Gmail address of 59915544ma@gmail.com, was associated with CyberTipline Report # 34166525 (Tumblr) and # 33837307 (Instagram). Therefore, I submitted search warrant 18-MJ-6066 issued by the United States District Court for the Central District of Illinois, to Google, INC. Google, INC owns Tumblr and Instagram.

22. On August 14, 2018, in response to that search warrant, Google, INC., provided specific information about the user of the Gmail account 59915544ma. The name associated with the account was "A Ro." Notably the recover email account was 5544nuraa@gmail.com. This is the same email account that was associated with the Tumblr account "icewolfperv," which was part of CyberTipline Report # 36642691 (Tumblr). Additionally, Gmail account 59915544 was created on August 25, 2017 at 21:23:17 (UTC).

a. Google, INC., also provided content that included over 2000 e-mails for 59915544ma@gmail.com. I reviewed a sample of these emails. Most notably, the name listed with this e-mail address is Aaron Hill.

INVESTIGATION OF AARON M. HILL (DOB: 05/23/1995)

23. According to an inquiry of Illinois Secretary of State (SOS) records, HILL has a 1999 Dodge Utility registered to him at 208 Mary Street, Washington, Illinois (208 Mary).

24. SOS records also show HILL has a valid Illinois's driver's license with a listed address as 208 Mary.

25. Since August 15, 2018, your Affiant has observed the 1999 Dodge Utility registered to HILL, numerous times, including early morning hours, at 208 Mary.

26. According to Tazewell County Court Records (2018-TR-011522), HILL received a citation on or about August 10, 2018 for Operating an Uninsured Motor Vehicle. In this specific case, HILL's address is listed at 208 Mary.

27. According to Washington Police Department (WPD) Records, on August 29, 2018, Sgt. Tyler Willi with the WPD, completed a traffic stop on HILL. HILL was driving the 1999 Dodge Utility that is registered to him. Sgt. Willi gave HILL a verbal warning for a traffic infraction.

28. According to Tazewell County Sheriff's Office Report 13-00174, Detective Eric Goeken and Detective Cy Taylor interviewed HILL on January 30, 2014 regarding HILL possessing child pornography. At the time of this incident, HILL was 17-years old and lived with his mother at 24553 Pleasant View Road in Washington, Illinois.

a. During that investigation, a male told Sgt. Scott Workman with the Greenville Police Department (IL) that he had previously sent child pornography to HILL of Washington. The male stated he sent the child pornography to HILL using the messaging application Kik and through standard messaging.

b. Detective Goeken contacted Pamela Hill, the mother of HILL, and requested and received permission to interview HILL. During the interview, HILL told Detective Goeken that the male sent him an image of a boy, between the age of 10 and 12, performing oral sex on another boy about the same age. HILL also acknowledged that other people have sent him child pornography through text messages.

c. Detective Goeken completed a forensic exam on HILL's cell phone and located over 20 files containing child pornography.

29. According to Tazewell County Assessment Office records, Pamela Hill is listed as the tax payer for the 208 Mary Street.

30. On Friday, September 7, 2018, I obtained a search warrant (18-MJ-6074) for 208 Mary Street, the 1999 Dodge SUV registered to HILL, and HILL's person from United States District Court for the Central District of Illinois. The search warrant commanded the search of 208 Mary Street, the 1999 Dodge SUV

registered to HILL, and HILL's person for evidence of federal child pornography offenses

31. On Tuesday, September 11, 2018, I, and other agents with Homeland Security Investigations executed the aforementioned search warrant at 208 Mary Street. HILL was located traveling in the 1999 Dodge SUV in Pekin, Illinois. At the time, your Affiant made contact with HILL and informed him that we were there to execute the aforementioned search warrant.

32. Your Affiant explained to HILL that he was not in custody. Your Affiant asked HILL if he would go to the Tazewell County Sheriff's Office and speak to your Affiant about the search warrant. HILL agreed. Your Affiant transported HILL, who was not handcuffed and sat in the front passenger seat of a undercover police vehicle, to the Tazewell County Sheriff's Office.

33. Pursuant to the aforementioned search warrant, your Affiant seized an Alcatel cell phone, model REVVL 5049W (IMEI 014976000890157) from the 1999 Dodge SUV. HILL identified this device as his cell phone.

INTERVIEW OF AARON M. HILL

34. Before speaking to HILL, your Affiant advised him of his Miranda Rights. HILL agreed to speak with me and Special Agent Eric Bowers, who was present in the interview room.

35. During the interview, HILL acknowledged obtaining, viewing child pornography files for about 10 years. HILL acknowledged accessing telephone applications such as Kik Messenger, Tumblr, and Telegram to search for, download and share child pornography.

36. HILL stated he views child pornography to combat his urge to be with children. HILL acknowledged that he fantasizes about receiving oral sex from children around the age of 10. HILL stated he masturbated to this fantasy the night of September 10, 2018.

37. Your Affiant showed HILL the image containing child pornography noted in paragraph 19a of this Affidavit. HILL acknowledged receiving this image on Kik messenger.

38. HILL acknowledged sharing child pornography with user "Enalta" on the messaging application on his cell phone.

INITIAL MANUAL SEARCH OF AARON M. HILL'S CELL PHONE

39. With HILL's written permission, Your Affiant manually reviewed the data contained in the application Telegram on HILL's cell phone. Prior to reviewing this data, HILL's cell phone was placed in Airplane Mode, which means it is prevented from receiving and transmitting data through the cellular network.

40. Your Affiant located the messages between HILL and user Enalta MFF (Enalta) on the application, Telegram. According the profile for Enalta, the user name is @OrganicBanana. Your Affiant noted the following during the review:

- a. The text messages started at 11:05 p.m., on August 8 (Year not displayed).
- b. At 11:07 p.m., HILL writes, "Hehe i has some stuffs if yew wanna see".
- c. At 11:07 p.m., Enalta writes, "Yess".
- d. At 11:07 p.m., HILL shares two files including the following.
 1. One file depicts a young boy approximately 4 to 6 years old performing oral sex on an adult male. The young boy is shown wearing a blue pajama-like onesie. The young boy is shown looking at the camera and then placing his right hand on the erect penis. The young boy then places the penis inside of his mouth. The young boy moves his head in a back-and-forth motion.
- e. At 11:08 p.m., Enalta writes, "Oh, Where did you get that one?"
- f. At 11:08 p.m., HILL writes, "Hehe old groups".
- g. At 11:26 p.m., HILL shares three more files with Enalta including the following.
 1. One file, a digital image, depicts a young male, approximately 4 to 6 years old. The young male is shown performing oral sex on an adult male.

The young boy is shown wearing a red and black pajama-like shirt with a Scooby Doo like cartoon character on it. The adult male is shown wearing a pulled up white shirt and blue striped shorts. The male is shown with his erect penis in the young male's mouth.

2. One file, a digital image, depicts a young male, approximately 7 to 9 years old standing in the woods. The young male is shown wearing only a plaid shirt. The young male is not wearing any pants or underwear and his penis is exposed.

h. At 11:49 a.m, through 11:50 a.m., HILL shares several files with Enalta including the following:

1. A video file depicting several young males, approximately 10 to 13 years old. The first scene depicts a young male is standing and wearing a blue shirt. A second male, wearing a plaid shirt, is sitting on his knees in front of the kid in the blue shirt. The second male is performing oral sex on the first child. The scene then depicts three young males, approximately 10 to 13 years old on a couch. The young males are nude and shown engaging in group sex. The first young male having his body in a position with chest against a couch cushion with his middle area up. The second male is shown moving his pelvic area in a back-and-forth motion against the first male buttocks. The second male has his hands on the first male's hip area. The

third male is shown positioned behind the second male with their pelvic areas aligned and moving in a back-and-forth motion.

2. A GIF image file (a lossless format for image files that supports both animated and static images) depicting a young boy, approximately 5 to 7 years old moving his tongue up and down and adult male's erect penis. The adult male is partially shown from the waist down. The adult male is lying on his back and the young boys is between the male's legs. The young boy is shown moving his tongue up and down on the adult male's penis.

i. Throughout the remaining text messages, HILL sends Enalta several digital files that contain child pornography including:

a. At 7:22 p.m., on August 14. HILL shares a video depicting a child approximately 1 year old standing up. An adult male is shown placing his erect penis in the child's mouth. The child is wearing a black shirt. The adult male's erect penis and left hand are only shown in the file.

j. At 7:58 p.m., Enalta writes, "Kinda wondering where you get all this stuff". HILL responds, "Kik".

k. At 10:06 a.m., on August 29, Enalta shares the following digital image with HILL:

1. A digital image depicting a young white boy approximately 5 to 7 years old. The boy is standing in a room wearing a red t-shirt that is pulled up.

The boy is not wearing any pants or underwear. The boy's penis is visible in the photo. The photo is blurry making it difficult to identify the child.

2. In the text messages following the sharing of the digital image, Enalta writes, "I asked him to get ready for bed so he gets naked to put on jammies. He doesn't know I took the pic. He just thought I was on my phone doing something else. Which is fine cuz he talks too much so I don't him telling his mom".

3. HILL responds, "Hehe", "I wanna fuck him".

41. Based on the aforementioned factual information, your affiant respectfully submits there is probable cause to believe that Aaron M. Hill has committed the offense of distribution of child pornography. Accordingly, a warrant for his arrest for said violation should be issued.

Further, affiant sayeth not.

s/ Steven Smith


STEVEN C. SMITH

Investigator, Washington Police Department
Task Force Officer DHS/ICE

Sworn and subscribed before me this 13th day of September 2018.

s/ Jonathan E. Hawley


Jonathan E. Hawley
UNITED STATES MAGISTRATE JUDGE