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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
THADDEUS LEWIS MCMICHAEL

Case: 2:12-mj-30147
Judge: Unassigned,
Filed: 02-29-2012 At 10:04 AM
USA V. MCMICHAEL (CMP)(MRM)

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 July 1, 2011 - February 17, 2012 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: Title 18, United States Code, Section 2252A(a)(2) Receipt of Child Pornography. Row 2: Title 18, United States Code, Section 2252A(a)(5) (B) Possession of Child Pornography

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

[X] Continued on the attached sheet.

Signature of Ryan E. Blanton
Complainant's signature

Ryan E. Blanton, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: February 29, 2011

City and state: Detroit, Michigan

Signature of Mark A. Randon
Judge's signature

Mark A. Randon, United States Magistrate Judge
Printed name and title

**AFFIDAVIT**

I, Ryan E. Blanton, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since August 2009, and am currently assigned to the Detroit Division Cyber Crime Squad. While employed by the FBI, I have investigated federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.
2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. On February 17, 2012, federal search warrants were executed at XXXXXX Franklin River Drive, Apt 307, Southfield, Michigan 48034 and XXXXXX Kilbirnie Avenue, Lathrup Village, Michigan 48076 in furtherance of an investigation involving the receipt and possession of child pornography.
4. I am submitting this affidavit in support of a complaint and arrest warrant authorizing the arrest of THADDEUS LEWIS MCMICHAEL for violations of Title 18, United States Code, Section 2252A(a)(2) and 2252A(a)(5)(B), the receipt and possession of child pornography.
5. The statements in this affidavit are based on the investigation of this matter by Affiant and other FBI personnel. Since this affidavit is being submitted for the limited purpose of securing a complaint and 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 THADDEUS LEWIS MCMICHAEL received and possessed child pornography.

**I. BACKGROUND OF THE INVESTIGATION**

6. On June 24, 2011, the Detroit, MI, division of the FBI was contacted by the Louisville, KY, division of the FBI concerning an individual on the social networking website www.facebook.com (Facebook), who was actively discussing child pornography and methods for downloading child pornography from the Internet. The Facebook user ID provided was MADTHAD08.
7. On the following dates the Facebook profile MADTHAD08 was viewed by Affiant or other FBI personnel:
  - a. July 1, 2011
  - b. July 5, 2011
  - c. August 12, 2011
  - d. October 12, 2011
  - e. January 5, 2012
  - f. January 8, 2012

Comments posted by the user ID MADTHAD08 included statements regarding methods to obtain child pornography on the Internet, methods of encrypting child pornography stored on a computer, and having recently masturbated while viewing child pornography.

8. Facebook, Inc. was issued two subpoenas for subscriber information and access logs. Results obtained from Facebook, Inc., included access logs, with accompanying IP addresses and access times, as well as subscriber information as THAD MCMICHAEL.
9. A search of the American Registry for Internet Numbers (ARIN) online database indicated that IP addresses provided by Facebook, Inc., were registered to the Internet Service Provider Comcast Cable Communications, Inc. Per their website, ARIN is a nonprofit organization responsible for managing the Internet numbering resources for North America, and a portion of the Caribbean.

10. Results from administrative subpoenas sent to Comcast Cable Communications, Inc., for IP addresses and corresponding times of access provided by Facebook, Inc., revealed that, at those dates and times, the IP addresses were assigned to accounts registered to KIMBERLY BALLENGER, XXXXX Kilbirnie Avenue, Lathrup Village, Michigan 48076, THADDEUS MCMICHAEL, XXXXX Franklin River Drive, Apt 307, Southfield, Michigan 48034, and SPECS HOWARD SCHOOL, 19900 West 9 Mile Road, Southfield, Michigan 48075.
11. On February 17, 2012, federal search warrants were executed at XXXXX Franklin River Drive, Apt 307, Southfield, Michigan 48034 and XXXXX Kilbirnie Avenue, Lathrup Village, Michigan 48076. A search of the Southfield residence resulted in the seizure of two laptop computers, one hard drive, two external hard drives, one flash drive, one mini SD flash card, 135 optical disks, two MP3 players, one Microsoft Xbox gaming console, one Nintendo Wii gaming console, one Nintendo memory card, one cable modem, and one network router. No evidence was seized from the Lathrup Village residence.
12. THADDEUS LEWIS MCMICHAEL (MCMICHAEL) was interviewed during the execution of the search warrant in Southfield. During the interview MCMICHAEL was shown a printout of the Facebook profile page for user ID MADTHAD08 and confirmed the account and profile belonged to him. MCMICHAEL was then shown a series of printed screen shots containing statements he posted on his Facebook page and was asked to explain the posts. The following are the statements from the printed screen shots accompanied with MCMICHAEL'S responses:
  - a. On 10/03/2011 in response to the statement "Stop downloading all that cee pee Thad, you're just asking for it" being posted by another user on MCMICHAEL'S Facebook page, MCMICHAEL wrote "WELL TELL 7 YEAR OLD GIRLS TO STOP SUCKING DICK SO SEXY." MCMICHAEL claimed this post was a joke.

- b. On 11/02/2011, MCMICHAEL wrote "that feel after you fap to cp. It's a feel like none other. It's like your floating on cloud 9 or something. fapping to some 40 year old women with fake tits makes your cum smell rotten. But fapping to a 9 year old girl attempt to please some guy with a hairy stomach makes your cum squirt out with such pure intensity that you feel like your floating on air. and the way your dick feel, OH GOD YOUR DICK will feel so fuzzy and warm. You moralfags need to at least try to fap to some cp at least once before you die. Because there is no other feel like it." MCMICHAEL claimed this post was a joke.
- c. On 11/27/2011, MCMICHAEL wrote "all cp isn't rape, Sometimes the kids want it. Most of the time they NEED it." MCMICHAEL claimed this post was a joke.
- d. On 12/01/2011, MCMICHAEL wrote "I gotta plan ahead, can't have all my classmates knowing I walk around with 6 gigs of cp...on my key chain." MCMICHAEL claimed this post was a joke.
- e. On 12/06/2011 in response to the question "How can you even be a pedo?" being posted by another user on MCMICHAEL'S Facebook page, MCMICHAEL wrote "anything younger than 16 is fine for me...thy have some 13 and younger stuff in here." MCMICHAEL claimed these posts were a joke.
- f. On 12/06/2011, MCMICHAEL wrote "I can fap to the same cp video for weeks, because it's sooo fucking hot!" MCMICHAEL claimed this post was a joke.
- g. On 12/08/2011, MCMICHAEL wrote "WHOS THE GIRL THAT WANTED TO SEE THE RETARD GUY GET GET BEAT OFF BE A NURSE? WELL HERE IT IS IF YOU STILL WANT TO SEE IT [link to video] For disabled people, sexuality is necessary...also it's CP...it's a nurse jacking off a 10 year old boy! not just any 10 year old boy, a retard 10 year old boy!" MCMICHAEL claimed to have originally come across the video on 4Chan.org in the /b/ conversation thread.

MCMICHAEL guessed the age of the male in the video to be eight to twelve years old. MCMICHAEL claimed the post was made as a joke.

- h. On 12/09/2011, MCMICHAEL wrote "Yea, I carry around a 8 gb drive full of CP." MCMICHAEL'S response to being asked about this post was "I plead the fifth."
- i. On 12/11/2011, MCMICHAEL wrote "I got my cp on truecrypt." MCMICHAEL claimed this was a joke and that he did not have Truecrypt encryption software.
- j. On 12/17/2011, MCMICHAEL wrote "I'm not renting a damn laptop. I need to keep at least 4 gigs of cp on my shit and I not dealing with takeing it off when I'm done." MCMICHAEL claimed this post was a joke.
- k. On 12/20/2011, MCMICHAEL wrote "using the dsi XL web browser, no computer, \$70 to see if they can fix it, no refunds, not sure if CP is on it or not..." MCMICHAEL claimed this post was a joke.
- l. On 01/04/2012, MCMICHAEL wrote "I JUST GOT THE GREATEST IDEA! what if i adot a little girl? I'm sure she wouldn't mind becoming my sex slave if i take her away from the orphenage. WHY DIDN'T I THINK OF THIS BEFORE? IT'S FOIL PROOF! Once she become sef aware that i'm cumming inside of her nighty, i'll ask her if she'd rather go back to the orphenage or come back to bed. yes it's perfect! Theres no way she'd would turn me down. Now i just gotts locate the michigan adoption agency tomorrow and my plan will be put into moation. Soon i'll have my very own loli and she'll have no where to run. BWAH HAHAAAAHA BWAH HAHAAAAAAA." MCMICHAEL claimed that this post was a joke and that he couldn't possibly actually adopt a little girl anyway.
- m. On 01/20/2012, MCMICHAEL wrote "megaporn was the first place I ever got fappable CP. It was 2 girls fucking each other. So hot I still fap to it to this day. RIP MAGAPORN. Gone to soon..." MCMICHAEL stated that he had located

and downloaded the described video about two or three years prior to the interview.


- n. On 01/30/2012, MCMICHAEL wrote "wake up, brother at school, mom at work i'm gonna finsh what i started, go to the computer, internet is off because of unpaid bill, forgot my cp usb at home, doesn't have cinamax on demand THIS HOUSE IF FUCKING SHIT!" MCMICHAEL stated that he had actually forgotten his USB drive but that he was joking about it containing child pornography.
  - o. On 02/01/2012, MCMICHAEL wrote "HOLY FUCK! I went to the liberby today to send some resamays out and left my usb drive plugged in a computer with all my cp, my resamay along with my name and address on it for about 30 mins. I can only thank kami-sama that nobody looked through it." MCMICHAEL stated that he had been at the library but he did not leave a USB drive behind.
  - p. On 02/01/2012, in response to the post "All your CP fits on one flash drive? I expected better from you" being written by another user on MCMICHAEL'S Facebook page, MCMICHAEL wrote "it's 20 gigs." MCMICHAEL stated that he did not own a twenty-gigabyte flash drive.
13. On February 17, 2012, and February 28, 2012, Affiant previewed the eight gigabyte usb flash drive belonging to MCMICHAEL. During the Affiant's review, numerous images and videos of real children engaged in sexually explicit conduct including, but not limited to, the lascivious display of the genitals and pubic area of any person, were located in the following directories:
- a. \things\don't click
  - b. \things\don't click\teens
  - c. \things\don't click\cp
  - d. \things\don't click\cp\cp

14. As of this date, Affiant found approximately 300 to 350 images and videos of child pornography among MCMICHAEL's electronic media seized during the execution of the Southfield search warrant.
15. Material found in the directory "\things\don't click\cp\cp" included images of tee-shirt designs featuring images of child pornography. The images showed an internet address of shirtmockup.com. The website shirtmockup.com allows users to upload images to design their own tee-shirts and download the resulting image for free.
16. Also located on the usb flash drive was a copy of MCMICHAEL'S resume.
17. Based on Affiant's review of the materials found in the directory "\things\don't click\cp\cp" on the usb flash drive belonging to MCMICHAEL, MCMICHAEL's statements, and Affiant's training and experience, Affiant believes that MCMICHAEL used the Internet, a means and facility of interstate or foreign commerce, to further his conduct related to his receipt and possession of child pornography.
18. Affiant concluded that THADDEUS LEWIS MCMICHAEL was the only individual who had received and possessed child pornography at the residence, XXXXX Franklin River Drive, Apt 307, Southfield, Michigan 48034 or XXXXX Kilbirnie Avenue, Lathrup Village, Michigan 48076.



**VI. CONCLUSION**

19. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that THADDEUS LEWIS MCMICHAEL received and possessed child pornography, using the Internet, a facility of interstate and foreign commerce, while within the Eastern District of Michigan.
20. Your affiant, therefore, respectfully requests that this Honorable Court issue a complaint and arrest warrant for THADDEUS LEWIS MCMICHAEL, for violations of Title 18, United States Code, Section 2252A(a)(2) and 2252A(a)(5)(B), the receipt and possession of child pornography.

  
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Ryan E. Blanton  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 29<sup>th</sup> day of February, 2012.

  
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MARK A. RANDON  
UNITED STATES MAGISTRATE JUDGE