

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

United States of America)

v.)

Douglas O. Mynatt)

Case No.)

20-MJ-7060)

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 January 11 -24, 2020 in the county of Champaign in the Central District of Illinois, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2252 and 2252A	Distribution, receipt, and possession of child pomography

This criminal complaint is based on these facts:

See attached affidavit of Investigator Dwayne Roelfs, Champaign County Sheriff's Office

Continued on the attached sheet.

s/ Dwayne Roelfs #505

Complainant's signature

Investigator Dwayne Roelfs, CCSO

Printed name and title

Attested to by the affiant in accordance with the requirements of Fed. R. Crim. P. 4.1 by electronic mail and telephone.

s/ Jonathan E. Hawley

Date: 04/03/2020

Judge's signature

City and state: Peoria, Illinois

Jonathan E. Hawley, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Dwayne Roelfs, being duly sworn, depose and state:

1. I am a Deputy Sheriff, with the Champaign County Sheriff's Office, assigned to the Criminal Investigations Division. I have been employed as an Investigator at the Champaign County Sheriff's Office for over twenty years. As part of my daily duties as an Investigator, 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 state and federal laws, 18 U.S.C. §§ 2252(a) 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 all forms of media including computer media. I have also participated in the execution of numerous search warrants, many of which involved child exploitation and/or child pornography offenses.

2. This affidavit is made in support of a criminal complaint to arrest, **Douglas O. Mynatt** for violations of 18 U.S.C. §§ 2252 and 2252A, which among other things, makes it a crime to possess, receive, and distribute child pornography, which has traveled in interstate commerce via the Internet by means of a computer.

3. The facts set forth in this affidavit are based on my personal knowledge and investigation. This affidavit is also based on knowledge I obtained from other individuals, including other law enforcement officers, my review of documents

related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

4. Because this Affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that Douglas O. Mynatt committed violations of 18 U.S.C. § 2252 and 2252A in the Central District of Illinois. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

5. The investigation has revealed that Mynatt utilized the Internet Protocol address (“IP address”) 23.123.74.109 on numerous dates including: January 9, 2020, January 10, 2020, January 15, 2020, January 20, 2020, and January 24, 2020 to distribute and possess child pornography using a computer/digital device that was located in his residence on the 100 block of Dropseed Ave, in Savoy, Illinois, in the Central District of Illinois. Mynatt chatted with other individuals and distributed child pornography images using the internet through an application based in the United States, referred to herein as “Application A.”

STATUTORY AUTHORITY

6. As noted above, this investigation concerns alleged violations of the following:

- a. Title 18, United States Code, Sections 2252(a)(2) and (b)(1) prohibit any person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any visual depiction using any

means or facility of interstate or foreign commerce, or that has been mailed or 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 reproducing 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 production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

- b. Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2) prohibit any person from knowingly possessing or accessing with the intent to view, or attempting or conspiring to possess or access with the intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.
- c. Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1) prohibit a person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.
- d. Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) prohibit a person from knowingly possessing or knowingly accessing with intent to view, or attempting or conspiring to do so,

any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

Background on Application A

7. Application A is a freeware instant messaging mobile app presently based in the United States. Application A is a smartphone messenger application that lets users connect with their friends and the world around them through chat. Users can send text, pictures, videos and more – all with the app.

8. Application A is available for download through the iOS App Store and the Google Play store on most iOS (iPhone, iPod, iPad), Android (including Kindle Fire) and Windows 7 devices. Application A is free to download and uses an existing Wi-Fi connection or data plan to send and receive messages, photos, videos, sketches, mobile webpages, and other content after users register a username. Application A is known for its features preserving users' anonymity, such as allowing users to register without providing a telephone number. However, the Application A application logs user IP addresses, which the company can use to determine location. As of May 2016, Application A Messenger

had approximately 300 million registered users, and was used by approximately 40% of United States teenagers.

9. A main attraction of Application A that differentiates it from other messaging apps is its anonymity. To register for the Application A service, a user must enter a first and last name, e-mail address, and birth date (which, as of February 2016, must show that the user is at least 13 years old), and select a username. The Application A registration process does not request or require the entry of a phone number (although the user has the option to enter one), unlike some other messaging services that require a user to provide a functioning mobile phone number.

10. In March 2015, the company adopted a more aggressive strategy by utilizing Microsoft's PhotoDNA cloud service to automatically detect, delete, and report the distribution of child exploitation images on its app.

11. In October of 2019, Application A Messenger announced they had been purchased by a company located in the United States.

Details of Investigation

12. On March 20, 2020, Investigator Roelfs received a CyberTip referral regarding the possession and distribution of child pornography. CyberTips are routinely distributed from the Illinois Attorney General's Office, Internet Crimes Against Children (ICAC) division. In this CyberTip the ICAC referral originated with the National Center for Missing and Exploited Children (NCMEC). Application A self-reported to NCMEC that one of their online social media users

was possessing content believed to be images and movies of child pornography. Application A reported that their user, identified as "[REDACTED]" shared some of the illegal content in a "private chat message" and the user shared other content in a "messaging group," consisting of multiple Application A users. On five different dates/online sessions between January 9, 2020, 1606 hours (CST) and January 24, 2020, 1157 hours (CST) a total of 15 digital files of suspected child pornography were uploaded by the suspect account, "[REDACTED]". Seven of the suspect files were sent from the suspect's account to other users via, "private chat message." Eight of the suspect files were sent from the suspect's account to other users in special "messaging groups."

13. When each suspected digital file of child pornography was shared, the user, "[REDACTED]" utilized the same IP address (23.123.74.109), an IP address controlled by AT&T and geo-located to Savoy, Illinois. I have viewed the suspected child pornography images and videos that were submitted to NCMEC for the user "[REDACTED]" and based on my training and experience, I believe the following to contain child pornography, as that term is defined by federal law.

- a. "bec6b35a-79f0-4312-b25b-01b3a1654f88.mp4" is a movie that is twenty eight (28) seconds in length. The movie contains a prepubescent minor Asian female with black hair approximately 8-11 years of age. The female appears to be sitting and she appears to be holding the recording device with her left hand while she touches her vagina with her right hand. The female is wearing a Mickey Mouse type pajama top and does not appear to be wearing any pants or underwear. On 01/11/2020 at 01:07:46 (UTC) this file was sent from the suspect to other users in a "messaging group".

- b. "dfd3cdcb-d72e-4b12-b3a9-f2542485f0ed.mp4" is a movie that is fifteen (15) seconds in length. The movie contains a prepubescent minor Asian female with black hair approximately 6-9 years of age. The female is wearing a coat and appears to be sitting in front of a bookshelf filled with books while looking towards the camera that is recording her. As the movie plays the camera view moves away from the female's face and down towards her vagina. The female is not wearing pants or underwear and her vagina is exposed to the camera. The female uses her right hand and places her fingers on and inside her vagina. On 01/11/2020 at 0125 hrs (UTC) this file was sent by the suspect to other users in a "messaging group".
- c. "5f475dc6-226f-4e0d-a9ec-9be9bb0e258f.mp4" is a movie that is thirty-eight (38) seconds in length. The movie contains a prepubescent minor Asian female with black hair approximately 8-11 years of age. The female is naked and positioned lying on her back with her arms stretched up and behind her head. As the movie plays the focal point changes. The camera moves down from the head of the female to the female's vagina where an adult white male's penis can be seen penetrating the female's vagina. On 01/11/2020 at 0156 hrs (UTC) this file was sent by the suspect to other users in a "messaging group".
- d. "3d064045-4982-453d-9e07-141311f368f0.mp4" is a movie that is one minute and twelve seconds (1:12) in length. The movie begins by showing three naked bodies, two white females and an adult white male. The adult male is positioned standing behind one female's buttocks with his penis inserted into that female's anus. The second white female is shown lying on her back positioned on top of the first white female's back. The second white female's vagina is fully exposed, and the camera's focal point is fixated on this female's vagina, the buttocks of the first female, and the adult male's penis that is penetrating the anus of the first female. There is a moment during this movie when the second female's face is partially visible. The faces of the first female and adult male are not visible. The age estimate of the first female is not possible because most of her body is covered by the second female that is lying on her back. The age of

the second female appears to be approximately 6-9 years of age. Additionally, the left hand of the adult male is visible, and the male's thumb is rubbing the second female's vagina and also inserted into the second female's vagina. On 01/15/2020 at 2221 hrs (UTC) this file was sent by the suspect to other users in a "messaging group".

- e. "1f96a0b5-8123-4ff3-9221-c31724f72480.jpg" is an image of a minor white female with brown hair approximately 11-13 years of age. The female appears to be seated naked from the waist up. The image is a close-up image of the female showing her from the waist up to her eyebrows. The female appears to have a pink colored pair of pants or shorts on. The female's bare breasts are exposed showing some indication of breast development. On 01/20/2020 at 1434 hrs (UTC) this file was sent by the suspect to other users in a "messaging group."
- f. "4385adbb-2745-4b70-a768-58805a4c9696.mp4" is a movie that is two minutes (2:00) in length. The movie contains a minor white female with blonde hair and being approximately 12-15 years of age. There is audio with this movie and the movie begins by the female talking to the camera/recording device stating her name was "Leslie" and saying that she was 12 years old and that it was her first time "masturbating". The female is in a bathroom and can be seen standing up and backing away from the camera. The female removes her shirt followed by removing her blue colored bra. During the movie voices in the background can be heard conversing along with the sound of a baby's cries. The female rubs her hands over her naked body including her bare breasts, buttocks, and vaginal areas. The female eventually sits on the bathroom floor and spreads her legs while rubbing her right hand and fingers on her vagina. The female has a large amount of pubic hair present. On 01/20/2020 at approximately 1436 hrs this file was sent by the suspect to other users in a "messaging group".
- g. "5e0073dc-176f-4535-848b-58db8bea4f5d.mp4" is a movie that is fifteen seconds (15) in length. The movie contains a prepubescent minor white female with brown hair and being approximately 6-9

years of age. There is audio present in this movie, however, the noises present do not appear to be from human voices. The female appears to be standing in a bathroom and is positioned towards the camera. The female is naked and begins by walking towards the camera and then kneeling on the floor directly in front of the camera. The female begins rubbing her bare under developed breasts followed by using both her hands to frame her vaginal area for the camera. The female then stands up turning around and squatting her buttocks down to the floor. The female then places her hands on the floor positioning herself on her hands and knees with her anus and vagina exposed to the camera. The female shakes her bottom while in this position. On 01/24/2020 at 1751 hrs (UTC) this file was sent by the suspect to another user via a "private chat message".

- h. "93d31804-511a-4544-9f2f-a899249b455e.mp4" is a movie that is one minute and eight seconds (1:08) in length. The movie contains a minor white female with brown hair and being approximately 12-15 years of age. There is audio present during this movie, however, only background noise is heard with no words or voices being discernable. The movie begins with the female using her left hand rubbing her vagina and inserting fingers into her vagina. The female then stands up turning around placing her buttocks towards the camera. The female rubs her buttocks and spreads them apart to show her anus and vagina to the camera. The female then turns back around towards the camera lifting her shirt showing and rubbing her bare breast. On 01/24/2020 at 1753 hrs (UTC) this file was sent by the suspect to another user via a "private chat message".
- i. "3beoff78-288e-4949-a775-66aa1d2d55d2.mp4" is a movie that is one minute and twenty-two seconds (1:22) in length. The movie contains a prepubescent minor Asian female with black hair and that is approximately 6-9 years of age. There is no audio present during this movie. The movie begins with the female exposing her under developed breasts seated in front of a camera device. The female then pulls her top up from her torso placing the shoulder straps over her shoulders. At approximately thirty-four seconds (34) into the movie, an adult white male who is not wearing pants and has an

erect penis approaches the side of the female. The female can be seen holding the male's penis as the male places his penis into the female's mouth. The male removes his penis from the female's mouth, masturbates himself and ejaculates onto the female's chest. On 01/24/2020 at 1754 hrs (UTC) this file was sent by the suspect to another user via a "private chat message".

- j. "caca73d7-1573-4784-8fd4-6211093eaa6c9.mp4" is a movie that is one minute and forty-five seconds (1:45) in length. The movie consists of a minor white female with blonde hair and that is approximately 10-12 years of age. There is audio noise present during the movie, but no voices are heard. The movie begins with the female sitting on the edge of a bed. The female is wearing a white colored sports type bra and no underwear clothing from the waist down. The camera moves to focusing on the female's vagina as she sits on the bed. The female then changes position by turning over and kneeling on the bed placing her buttocks facing the camera. On 01/24/2020 at 1757 hrs (UTC) this file was sent by the suspect to another user via "private chat message".

14. Investigator Roelfs determined that the IP address 23.123.74.109 was assigned to the Internet Service Provider: AT&T, headquartered at 11760 U.S. Highway 1, Suite 300, North Palm Beach, FL. On March 23, 2020, your affiant sent a State of Illinois Subpoena Duces Tecum to AT&T for the IP records maintained by AT&T, who holds the registration on the IP address 23.123.74.109, requesting subscriber information for the user of that IP address on the date and time that the

suspect files were transferred/distributed on Application A, between January 9, 2020, 22:06:42 (UTC) and February 5, 2020 02:48:27 (UTC), as detailed above.

15. On March 24, 2020, AT&T provided the results from the Subpoena Duces Tecum. The results stated that IP address 23.123.74.109, was assigned to subscriber S.M. at the 100 block of Dropseed Dr., in Savoy, Ill., in the Central District of Illinois. AT&T further provided an associated phone number for this subscriber account, and noted that the account was currently “active.”

16. A law enforcement database check revealed that S.M. currently resides at the 100 block of Dropseed Dr., Savoy, Illinois and that she has reportedly lived at this address since February 2010. The database check also revealed that Douglas O. Mynatt shared this residence. Additional investigation revealed that S.M. and Mynatt appeared to share a child who is approximately 13 years old.

17. On March 25, 2020, your affiant checked the Illinois Secretary of State database and learned that Douglas O. Mynatt, is a white male born in August, 1963, with an affiliated address listed on his driver’s license on the 100 block of Dropseed Dr., Savoy, Illinois, 61874.

18. The database check also revealed that Mynatt was possibly employed by “University Laboratory High School” located at the 1200 block of W. Springfield Ave., Urbana, Illinois (located on campus at the University of Illinois). The online social media check revealed a Facebook profile for Mynatt and a check of his timeline revealed that Mynatt updated his profile picture and cover photo in November 2019. The picture and photo updates showed Mynatt posing with high

school aged female cross-country runners. Additional photos on Douglas's Facebook timeline showed him posing in front a "University of Illinois - University High School - 1212 W Springfield Avenue" sign.

19. On March 26, 2020, your affiant traveled to 103 Dropseed Dr., Savoy, Illinois 61874, to observe and photograph the residence. Additionally, your affiant used his work cell phone to scan the immediate vicinity of the residence for available wireless Wi-Fi networks. Your affiant detected a total of fifteen different wireless Wi-Fi networks and noted that all these available networks were secured networks requiring a password to join.

20. On March 27, 2020, your affiant received notification from Taylor Burd, National Center for Missing and Exploited Children (NCMEC) analyst 1, Child Victim Identification Program, that one of the movie files, "3beoff78-288e-4949-a775-66aa1d2d55d2.mp4", that suspect user, "[REDACTED]" shared with other users on the Application A social media platform contained a victim child that has been identified from a previous investigation conducted by the Federal Bureau of Investigation. The description of this movie file can be located above in this affidavit under paragraph 13, subparagraph (i). Your affiant noted from the Child Identification Report, TA#132063, that this movie file was from the series "At School."

21. Included within the cybertip from Application A were additional IP addresses for logins by the user "[REDACTED]" on various dates and times. Your affiant determined, through publically available database checks that an IP

address frequently used by "[REDACTED] 130.126.255.137, resolved to the University of Illinois, in Champaign/Urbana. On March 27, 2020, a U.S. Department of Justice administrative subpoena was served on the University of Illinois to determine the user assigned to this IP address on the dates and times requested in the subpoena. Due to the COVID-19 public health emergency, the University of Illinois indicated that there may be a delay in providing a detailed response to the subpoena, however, University Counsel for the University of Illinois indicated that the primary user of the IP addresses on the dates and times requested in the government's subpoena was Douglas O. Mynatt.

22. On April 2, 2020, United States Magistrate Judge Eric I. Long authorized the search of Mynatt's residence on the 100 block of Dropseed Dr. in Savoy, Ill. On April 3, 2020, the Champaign County Sheriff's office, the Department of Homeland Security, and the Urbana Police Department executed the search warrant at approximately 7:45 am. Mynatt, S.M., and their minor child were only people in the residence.

23. Mynatt was transported to the Champaign County Sheriff's office for interview. After being properly advised, Mynatt waived his rights and agreed to an interview.

24. Mynatt acknowledged that he had created/used two Application A accounts [REDACTED] and [REDACTED]. He said he utilized both accounts to receive and distribute child pornography files in public groups and private messages. Mynatt stated that around January 2020 the [REDACTED] account was shut down by

Application A. Mynatt said that Application A advised him that this account had violated their terms of service and he knew the account had been shut down due to child pornography trafficking.

25. Soon after the [REDACTED] account was shut down Mynatt created a new Application A account, [REDACTED]. He stated that this account is currently logged in on the application on his iPhone. He stated that he has used this account to send and receive child pornography files.

26. Mynatt said that other Application A users would send him Mega NZ¹ hyperlinks which he would click on and then download the images/videos to his phone. Mynatt said that whenever he sent files to another Application A user he just attached the file itself, rather than sending a hyperlink.

27. Mynatt stated that he saves child pornography files to the Photos application on his iPhone. He admitted that there would be child pornography currently stored in the Photos application.

28. Mynatt acknowledged that he has utilized his iPhone to access his Application A account(s) from his residence and also from University High School, where he is employed as a PE teacher/coach.

29. Mynatt stated that he sometimes masturbates when he views child pornography.

¹ I know based on my training and experience and the training and experience of other law enforcement agents that Mega NZ is a cloud storage platform that allows individuals to trade a large volume of files and is frequently utilized by child pornography offenders.

30. Mynatt stated that there have been “multiple times” that he has felt guilty about his child pornography activities and so he would stop for a while, but then he would start up again. Mynatt stated that when he stopped he would delete the pictures / videos from his phone and would also delete Application A.

31. Mynatt stated that he does have a Mega NZ application on his iPhone but he doesn't believe that he has anything stored in that account.

32. Mynatt stated that he had a sexual relationship with two individuals who he met while they were his students. He claimed that the individuals were over 18 and out of school when the sexual relationship occurred.

33. Agents located a picture of a minor female in his computer bag. Mynatt indicated that he received this image from another individual he chatting with on Application A. This individual stated the image depicted his step daughter and directed Mynatt to print image, masturbate to it, video tape this conduct, and email the video back to him. Mynatt denied doing so.

34. Specially trained digital media agents have begun a preliminary examination of Mynatt's devices. They have extracted approximately 50% of data

from Mynatt's 55 GB iPhone device have located 90 videos and 176,000 images of which over half appear to depict child exploitation and child erotica materials.

Respectfully submitted,

s/ Dwayne Roelfs

Dwayne Roelfs, Investigator
Champaign County Sheriff's Office

Attested to by the affiant in accordance with the requirements of Fed. R. Crim. P. 4.1 by electronic mail and telephone on April 3, 2020.

s/ Jonathan E. Hawley

JONATHAN E. HAWLEY, Magistrate Judge
United States District Court