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United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

RANDY DAVIES ANDERSON

CRIMINAL COMPLAINT
Case Number:
MJ-11-367-AJB

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From in or about January 2011 through on or about September 2011, in Carver County, in the State and District of Minnesota, the defendant did knowingly employ, use, persuade, induce, entice, and coerce Jane Doe #1, a minor child, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, a computer image file titled, "DSCN0502.jpg," in violation of Title 18, United States Code, Sections 2251(a) and (e).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Signature of Complainant
Robert Blackmore, FBI

Sworn to before me, and subscribed in my presence

10/6/11 at St. Paul, MN
Date City and State

UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer

SCANNED
OCT 07 2011
U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF ROBERT J.E. BLACKMORE
COUNTY OF RAMSEY)

I, Robert J. E. Blackmore, being duly sworn, hereby depose and say:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed for over ten years. I am currently assigned to the Minneapolis, Minnesota, Division of the FBI and work on the Minnesota Cyber Crime Task Force. I have received specialized FBI training in both the investigation of computer and computer-related crimes and crimes involving the sexual exploitation of children. As a member of the Cyber Crime Task Force, my responsibilities include the investigation of various criminal offenses involving computers, computer networks, and the Internet, including the investigation of crimes involving the sexual exploitation of children. While employed by the FBI, I have participated in numerous investigations in which I have collected evidence in an electronic form.

2. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents involved in this investigation; and upon my review of official reports submitted in relation to this investigation. Further, this affidavit contains information to support probable cause but is not intended to convey facts of the entire investigation.

3. This affidavit is made for the purpose of establishing probable cause in support of a criminal complaint and federal

arrest warrant for Randy Davies Anderson, and therefore contains only a summary of relevant facts.

4. On July 25, 2011, as part of a separate child pornography investigation, your Affiant became aware of the use of an internet account, mysisterkid@yahoo.com, that was being used to distribute child pornography.

5. On August 8, 2011, I accessed the e-mail address, mysisterkid@yahoo.com and began a review of the contents of the e-mail account mysisterkid@yahoo.com. During this review I observed an e-mail in the "inbox" from a "Randy Anderson" that was dated January 28, 2011. The e-mail address that this e-mail was sent from was ranjen47@yahoo.com.

6. This e-mail had two image files attached to it that depicted child pornography. These images were titled DSCN0502.jpg and DSCN0503.jpg and were both dated "01.06.2011." The body of this e-mail contained text, which identified the child in the photographs and also provided information regarding when the photographs were taken. Your affiant reviewed the images described as follows:

a. DSCN0502.jpg is an image of a naked prepubescent girl (Jane Doe #1) sitting next to and touching the penis of an adult male. The male in the image has a mole or birthmark on his left breast.

b. DSCN0503.jpg is an image of a naked prepubescent girl sitting down with her legs spread exposing her genitalia.

7. Based on additional investigation, your Affiant learned that the account ranjen47@yahoo.com was subscribed in the name of Randy Anderson, with an address in Carver, Minnesota.

8. On September 7, 2011, agents served a federal search warrant that authorized the search of Anderson's residence in Carver, Minnesota.

9. Your affiant approached Anderson during the execution of this search warrant and requested an interview. Anderson waived his Miranda rights and agreed to be interviewed. During the interview, Anderson admitted using the email account ranjen47@yahoo.com to receive and distribute child pornography.

10. I showed Anderson printouts of the child pornography images described above. Anderson admitted that he took these images with his camera, in his residence, and that the images depicted a female child with the date of birth XX/XX/2005 and him. Anderson said that after taking the pictures, he put these images in his computer.

11. I showed Anderson a printout of the email sent by ranjen47@yahoo.com to mysisterkid@yahoo.com dated January 28, 2011, which contained two images of child pornography. Anderson admitted that he sent this email with the attached child pornography images to the recipient.

12. Data contained within the child pornography images described above showed that the images had been taken with a Nikon Coolpix S230 camera. During the search warrant of Anderson's

residence the same make and model camera was seized. This camera is marked "MADE IN INDONESIA."

13. Based upon these facts conveyed in this affidavit, your affiant believes that there is probable cause that between, on or about January 6, 2011, through on or about September 7, 2011, Randy Davies Anderson committed the offenses of production, distribution, and possession of child pornography in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2252(b)(1).

Further your Affiant sayeth not.

ROBERT J. E. BLACKMORE
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this 6th th day of October, 2011.

Janie S. Mayeron
United States Magistrate Judge