
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

KEVIN FULLER

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about April 28, 2009, at Oak Park, in the Northern District of Illinois, Eastern Division, and elsewhere, KEVIN FULLER, defendant herein:

using a means or facility of interstate commerce, namely, the internet, knowingly transported and shipped child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled, "chugchugchug.jpg";

in violation of Title 18, United States Code, Section 2252A(a)(1). I further state that I am a Customs Officer with Immigration & Customs Enforcement, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant

MICHAEL BRUNS

Customs Officer, Immigration & Customs Enforcement

Sworn to before me and subscribed in my presence,

November 19, 2009

Date

at Chicago, Illinois

City and State

SUSAN E. COX, U.S. Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT)
) ss
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, MICHAEL BRUNS, being duly sworn, state as follows:

1. I am a Special Investigator with the Office of the Illinois Attorney General currently designated as a Customs Officer with the U.S. Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), assigned to the Cyber Crimes Unit. I have been a law enforcement officer for over sixteen years. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that KEVIN FULLER has violated Title 18, United States Code, Section 2252A(a)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging FULLER with knowingly transporting child pornography, 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 the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and information provided by FULLER.

FACTS SUPPORTING PROBABLE CAUSE

A. Evidence Obtained from FULLER's E-Mail Account

4. On October 14, 2009, I sought and received a search warrant from Magistrate Judge Nan R. Nolan to search Google/Gmail records, including stored e-mail communications, for the e-mail address "lifesrichpagaent@gmail.com." As described below, that e-mail address was used by FULLER. I received the records on approximately October 22, 2009.

5. Google/Gmail's stored e-mail communications showed that lifesrichpagaent@gmail.com has continually expressed a sexual interest in children. For example, between September 26, 2009 and September 28, 2009, lifesrichpagaent@gmail.com exchanged more than 40 e-mails with an individual during which the two discussed molesting a child who was being breastfed. Specifically, lifesrichpagaent@gmail.com described the child's mother, stating "she's just recently delivered and would like to fold breastfeeding the kid into whatever plans you have for them." lifesrichpagaent@gmail.com further stated, "We were thinking that you could use and abuse wife while she's nursing.. If you got close to cumming, you could share your load with both, give them both a facial." The e-mail conversation continued with lifesrichpagaent@gmail.com stating "Would love to see you really work wife and initiate daughter. You have other pics? Of cock? Would love to see your cock in dau. mouth." Based upon my training and experience, I understand this e-mail to be a request from lifesrichpagaent@gmail.com to see the person with whom he was corresponding place his penis into an infant's mouth. The two continued to

correspond, and lifesrichpagaent@gmail.com sent a photograph that he purported to be of the daughter. The other individual responded, "Has she ever been penetrated before," and then later stated, "How old is she?....looks like 3 months."

6. On October 17, 2009, lifesrichpagaent@gmail.com exchanged more than 10 e-mails with another individual during which the two discussed molesting a young boy. Specifically, lifesrichpagaent@gmail.com identified himself in an e-mail, stating "married couple here. she's big and breasty (recently delivered). You interested in getting wild and kinky with this family? We have pics." lifesrichpagaent@gmail.com further offered "ok with making out with me and wife while she breastfeeds son....then you and I both get off and that's where the incest might come in." After more discussion of a sexual nature, lifesrichpagaent@gmail.com stated, "Son is real yng. We'd be getting kinky / dirty and just using his mouth to dump into." Based upon my training and experience, I believe that lifesrichpagaent@gmail.com was offering the use of who he claimed to be his young son for himself and another man to ejaculate into the boy's mouth.

7. On October 20, 2009, lifesrichpagaent@gmail.com exchanged more than 25 e-mails with another individual during which the two discussed sex with a mother and her infant child. During this e-mail conversation, lifesrichpagaent@gmail.com asked "into incest?" and further stated, "Would love to hook up with new mommy. Suck those big tits. If mommy wanted me to play with her and little one, that would be cool too." The two further discussed that the mother was still breastfeeding. After discussing the measurements of their own sexual organs, lifesrichpagaent@gmail.com stated that he wanted to be sexually

involved with "mommy, daughter, and you." lifesrichpagaent@gmail.com then asked, "if daughter is yng you cool?" Based upon my training and experience, I believe that this series of e-mails involved lifesrichpagaent@gmail.com inquiring as to the possibility of sex with a minor female.

8. The Google/Gmail stored communications also contained images of suspected child pornography that lifesrichpagaent@gmail.com distributed over e-mail. As an example, the following images were sent by lifesrichpagaent@gmail.com to other e-mail addresses and then stored in the "sent" folder of lifesrichpagaent@gmail.com's Gmail account:

a. On or about February 8, 2008, at approximately 4:01 a.m., lifesrichpagaent@gmail.com sent an e-mail to an individual with an AOL e-mail account, with a subject line that stated, "Inside." The e-mail stated, "here's the beginning..." The e-mail contained an attached picture file titled "75.jpg." The attached picture file displayed a nude prepubescent child who appears to be a real child. A nude adult male is penetrating the prepubescent child in the anus with his penis.

b. On or about May 18, 2008 at approximately 1:10 p.m., lifesrichpagaent@gmail.com sent an e-mail to an individual with a Yahoo account, with a subject line that stated, "Re: hi fromSilverDaddies." The e-mail stated, "Enjoy..think we could have a great time jacking to these and more...." The e-mail contained attached picture files titled, "Dad son 10423.jpg," "Dad son 1028.JPG," "Nephew91.JPG," and "Dad son 10617." All of the attached picture files contained apparent child pornography. For

example, the file "Dad son 10423" displayed a nude prepubescent male who appears to be a real child. A nude adult male's penis is inserted into the prepubescent male's mouth. The file "Dad son 10828" displayed a prepubescent male who appears to be a real child. A nude male's penis is inserted into the prepubescent male's anus. The file "Dad son 10423" displayed a nude prepubescent male who appears to be a real child. A nude adult male's penis is inserted into the prepubescent male's mouth. The file "NEPHEW.JPG" displayed a prepubescent male who appears to be a real child. A nude male's finger is inserted into the prepubescent male's anus. The file "Dad son 10617" displayed a prepubescent male who appears to be a real child. A nude adult male's penis is inserted into the prepubescent male's anus.

c. On or about April 28, 2009 at approximately 1:39 a.m., lifesrichpagaent@gmail.com sent an e-mail to an individual with a Yahoo account, with a subject line that stated, "Re: Nice big cock and fun b/f bedtime." The e-mail contained an attached picture file titled, "chugchugchug.jpg." The attached picture file contained apparent child pornography. Specifically, the file "chugchugchug.jpg" displayed a prepubescent male who appear to be real child. A nude adult male is inserting his penis into the mouth of the prepubescent male.

d. On or about May 5, 2009, at approximately 6:33 p.m., lifesrichpagaent@gmail.com again sent the photograph described in paragraph 8(c), this time to an individual with a Gmail account.

9. On or about May 18, 2008, at approximately 6:07 p.m., lifesrichpagaent@gmail.com sent an e-mail to the same Hotmail user as was described in paragraph 8(b) in which lifesrichpagaent@gmail.com stated "How bout these? i'd still like to jo with you or suck you while you look at my very big collection." Based upon my training, I believe that "jo" means "jack off" or masturbate, and that when lifesrichpagaent@gmail.com referred to his "very big collection" he was referring to possessing more images of child pornography.

10. According to records received from Google via subpoena, lifesrichpagaent@gmail.com is registered to KEVIN FULLER with a secondary e-mail address of kgfuller@colum.edu. Further, according to records received from Google, lifesrichpagaent@gmail.com accessed his e-mail account on a daily basis, including as recently as October 20, 2009 (the date of the return of the Google subpoena).

11. IP addresses related to lifesrichpagaent@gmail.com's account show that the account has been accessed from two locations. The account was most frequently accessed from an address where FULLER resides in Oak Park, Illinois. Specifically, the account was accessed from the Oak Park address on April 28, 2009 at approximately 1:39 a.m., when the child pornography described above in paragraph 8(c) was sent, and May 5, 2009 at approximately 6:33 p.m., when the child pornography described above in paragraph 8(d) was sent. From June 29, 2009 to July 27, 2009, the lifesrichpagaent@gmail.com account was accessed approximately 144 times from the Oak Park address. The account was also accessed from an address associated with Columbia College. (Based upon a search of

the Columbia College website, FULLER is employed as a professor at Columbia College.) Specifically, from June 29, 2009 to July 27, 2009, the account was accessed 65 times from an IP address associated with Columbia College.

B. Evidence Obtained During Search of FULLER's Residence

12. I obtained a federal search warrant for FULLER's Oak Park, Illinois residence, and law enforcement officers executed the warrant on November 19, 2009. In FULLER's residence, officers discovered an HP Pavilion tower computer, Model No. A6620F, Serial No. 3CR8431KQM. A preliminary forensic examination of that computer showed images of infants and prepubescent children engaged in sexually explicit activity.

13. In the course of the execution of this warrant, FULLER was given *Miranda* warnings. He waived his right to remain silent and agreed to be interviewed. During the interview, FULLER stated that he has used the e-mail address lifesrichpageant@gmail.com for approximately the last two years, including to receive and distribute images of children engaged in sexually explicit activity. Officers showed FULLER printed copies of the e-mails described in paragraphs 6 through 8, above. FULLER admitted sending the e-mails and accompanying images – including the email sent by lifesrichpagaent@gmail.com on or about April 28, 2009 at approximately 1:39 a.m., entitled "Re: Nice big cock and fun b/f bedtime" and attaching a picture file titled, "chugchugchug.jpg" – and initialed each e-mail and image. FULLER further stated that the HP Pavilion tower computer, Model No. A6620F, Serial No. 3CR8431KQM discovered in his residence belonged to, and was exclusively used by, him.

CONCLUSION

14. Therefore, there is probable cause to believe that defendant KEVIN FULLER knowingly transported child pornography using a facility of interstate commerce, in violation of Title 18, United States Code, Section 2252A(a)(1).

FURTHER AFFIANT SAYETH NOT.

MICHAEL BRUNS
Customs Officer, Immigration & Customs Enforcement

SUBSCRIBED AND SWORN to before me on November 19, 2009.

SUSAN E. COX
United States Magistrate Judge