

AUSA

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

DAVID KNEITEL)
a/k/a "Piggypiggy")

Case No

8:15MJ1828JSS

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 December 17, 2015 in the county of Hillsborough in the Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

18:2252(a)(4)(B)

Possession of child pornography.

This criminal complaint is based on these facts:

See Affidavit

I certify the foregoing to be a true and correct copy of the original.
SHERYL L. LOSECK, Clerk
United States District Court
Middle District of Florida
Deputy Clerk

Continued on the attached sheet.

[Signature]
Complainant's signature

Michelle Gonzalez, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/17/15

[Signature]
Judge's signature

City and state: Tampa, Florida

JULIE S. SNEED, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michelle Gonzalez, being sworn to tell the truth, state the following:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since August, 2008. Beginning December, 2009, to the present, I have been assigned to the Innocent Images Task Force, members of which investigate the sexual exploitation of children, in the Tampa, Florida Division of the FBI. I have investigated and assisted in the investigation of numerous criminal matters involving the sexual exploitation of children which constituted violations of Title 18, United States Code, Sections 2422(b), 2251, 2252 and 2252A, as well as Florida state statutes that criminalize the online enticement of minors and the production, possession, receipt, and transmission of child pornography, that is, visual images depicting minors engaged in sexually explicit conduct. I have made arrests and been involved in numerous searches pertaining to these types of investigations. I have attended numerous specialized courses involving computers and child exploitation. I have received training for online undercover investigations involving child exploitation. Prior to December, 2009, I was assigned to the Cyber Squad where I investigated criminal and national security matters that related to the Internet. As a Special Agent, I am authorized to investigate violations of laws of the United States and to execute arrest and search warrants issued under the authority of the United States.

2. I have probable cause to believe that David KNEITEL knowingly possessed child pornography in violation of 18 U.S.C. § 2252(a)(4)(B) at his residence at [REDACTED] Tampa, FL 33647. I submit this application and affidavit in support of a criminal complaint for the arrest of KNEITEL.

3. The statements contained in this affidavit are based in part on: information provided by FBI special agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the criminal complaint.

RELEVANT STATUTES

4. 18 U.S.C. § 2252(a)(4)(B) and (b)(2) prohibits a person from knowingly possessing, accessing with intent to view, or conspiring or attempting to access with intent to view any matter which contains a visual depiction 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, or was produced using materials that have been mailed, shipped, or transported in such commerce, by any means including by computer, if the visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

5. "Child Pornography," as used herein, is defined in 18 U.S.C. § 2256(8) as any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual

depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

**BACKGROUND OF THE INVESTIGATION AND
PROBABLE CAUSE FOR CRIMINAL COMPLAINT**

6. The user of the Internet account, "piggypiggy," identified as David KNEITEL of [REDACTED] Tampa, FL 33647, has been linked to an online community of individuals who regularly send and receive child pornography via a website that operated on an anonymous online network. A search warrant was obtained for the residence of KNEITEL based upon information law enforcement acquired of KNEITEL's activities on a website designed specifically to facilitate anonymous communication over the Internet and that catered to users interested in child pornography.

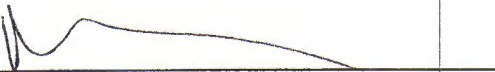
7. On December 17, 2015, I executed the search warrant at KNEITEL's residence at approximately 6:12 a.m. Upon approaching the residence, agents knocked and announced their presence and requested that KNEITEL open the door. After a delayed period of time, agents forced the front door open and entered the residence. Upon entering the residence, an agent saw KNEITEL move from one room to another as if trying to evade law enforcement. Outside the residence, other agents saw KNEITEL in a bedroom holding a knife in an upward manner up by his head, with his back toward the wall, in a stance that would have permitted him to stab the agents had they moved towards him. Outside agents broke the bedroom window in the room

where KNEITEL was posed with the knife and tasered him, and placed him in handcuffs.

8. A preview of the KNEITEL's computer at the residence showed that KNEITEL possessed numerous images and videos of child pornography, including images of prepubescent minors engaged in sexually explicit conduct. Post Miranda, KNEITEL said that he had been on the network discussed previously, and had accessed, viewed and saved child pornography images from the network. KNEITEL admitted using other networks and boards to search for, view, obtain and save child pornography. An external hard drive upon which KNEITEL saved and catalogued child pornography was manufactured in China. Agents are still in the process of analyzing items found during the search warrant.

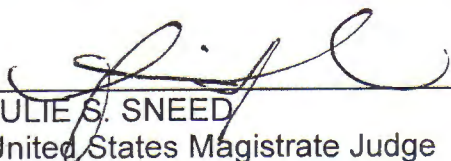
CONCLUSION

9. Based on the foregoing, there is probable cause to believe that KNEITEL possessed child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B).



Special Agent Michelle Gonzalez
Federal Bureau of Investigation

Subscribed and sworn to before me
this 17 day of December, 2015.



JULIE S. SNEED
United States Magistrate Judge