

FILED IN OPEN COURT
DATE: 11-17-10

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

DEPUTY CLERK

Western DISTRICT OF Virginia

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Willis E. Coley

3:10-mj-00220

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 28, 2010 in Albemarle county, in the Western District of Virginia defendant(s) did, (Track Statutory Language of Offense)

knowingly transport or ship using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, any child pornography.

in violation of Title 18 United States Code, Section(s) 2252A(a)(1)

I further state that I am a(n) Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

See Attached Affidavit hereby incorporated by reference as if fully restated herein.

Continued on the attached sheet and made a part hereof:

Yes No

Lynne A. Stopford

Lynne A. Stopford
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

11-17-10 at Charlottesville, Virginia
Date City and State

B. Waugh Crigler, United States Magistrate Judge

B. Waugh Crigler

Name & Title of Judicial Officer

Signature of Judicial Officer

*Rec'd w/ Crim.
Compl in open
court
11-17-10
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USMT*

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE, VIRGINIA

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO.
)
 Willis E. Coley)
)
)
)
)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Lynne A. Stopford, am a special agent with the Federal Bureau of Investigation (FBI) and have been employed in that capacity since May 25, 2009. I am currently to the Richmond Division, Charlottesville Resident Agency, of the FBI. As a Special Agent, I am currently assigned to investigations of criminal matters, including the one set out in this affidavit which concerns an investigation related to child exploitation and child pornography. The information set forth in this affidavit is based on information provided to me by Detectives Nick Rudman and Scott Godfrey of the Charlottesville Police Department, FBI Special Agents Brenda Born, and Michael P. French, and FBI Computer Scientist Brenda Baughman. This affidavit sets forth facts sufficient to support a criminal complaint charging Willis E. Coley with transporting child pornography in violation of Title 18, United States Code, Section 2252A(a)(1).

BACKGROUND OF THE INVESTIGATION

2. The probable cause supporting this criminal complaint arose from two peer-to-peer (P2P) sharing sessions (both on October 28, 2010) during which child pornography was distributed. Additional information was gathered during the execution of a federal search at Willis E. Coley's residence on November 17, 2010, located at 5840 Cameron Run Terrace, Apartment 1027, Alexandria, Virginia 22303. In both P2P sessions, the recipient of the material was Detective Nicholas Rudman of the Charlottesville Police Department, operating in an undercover capacity.

October 28, 2010, 1st Undercover Session

3. On September 20, 2010, Detective Rudman sent a friend request to username "willwll420" which was later accepted by willwll420. Then on October 28, 2010 when Detective Rudman logged into the file sharing program, username "willwll420" sent Detective Rudman his password for his shared folders. Detective Rudman was able to view files with titles indicative of child pornography and download files from "willwll420's" computer that "willwll420" selected to share with Detective Rudman.
4. On October 28, 2010, Detective Nicholas Rudman, using a computer located within the Charlottesville Police Department, connected to the user "willwll420" utilizing a publicly-available P2P file sharing program. Once connected to the user "willwll420," Detective Nicholas Rudman was able to browse the shared folders of "willwll420" and observed numerous file names indicative of child pornography.
5. During the session, Detective Rudman selected three movie files with titles indicative of child pornography and began to download these files directly from

“willwll420’s” computer between 15:10 (EST) and 15:18 (EST). During the download of these files, Detective Nicholas Rudman used a software utility in order to identify the IP address of “willwll420’s” computer. The IP address was 98.169.189.115. Detective Rudman also noted during the undercover session a large number of movie file names indicative of child pornography. Detective Rudman reviewed the movie files downloaded and based on his experience in law enforcement, determined the movie files depicted child pornography. The following is a description of two of the movie files downloaded:

- a) **“Inna Private 4yo close-up anal] pedo pthc young girl child 5yo 6yo 7yo 8yo daddy incest fuck.avi”** is a movie file, 48 seconds in length, that depicts an adult male penetrating a prepubescent child’s anus with his penis. The pre-pubescent child appears to be under the age of five years old.
- b) **“(Pthc) 6Yo Girl Kidnaped And Raped In Woods.mpg”** is a movie file that depicts a nude pre-pubescent female laying on her back with her legs spread open. An adult male is digitally penetrating the girl’s vagina. This movie file was a partial download and the portion captured is about 55 seconds in length.

October 28, 2010, 2nd Undercover Session

6. On a 2nd undercover session, on October 28, 2010, Detective Nicholas Rudman, using a computer located within the Charlottesville Police Department, connected to the Internet utilizing a publicly available P2P file sharing program. Once logged onto the Internet, Detective Nicholas Rudman

looked at his network of “friends” and observed that an individual using the username “willwll420” was still logged onto the P2P network.

7. Detective Nicholas Rudman browsed “willwll420’s” shared folders and observed files with titles indicative of child pornography based on his training and experience. Detective Nicholas Rudman selected three movie files and five images for download from “willwll420’s” shared files and began to download these files directly from “willwll420’s” computer between 15:29 (EST) and 15:38 (EST). During the download of these files, Detective Nicholas Rudman used a software utility in order to identify the IP address of “willwll420’s” computer, which was 98.169.189.115.
8. Detective Rudman reviewed the downloaded files and based on his experience in law enforcement, determined that most of these files depicted child pornography. Among these eight files downloaded three files are briefly described below:
 - a) **“(Pthc) 9Yo Jenny Blows Dad & Dog.mpg”** is a partial movie file download that is 4 minutes and 52 seconds in length. The movie starts out with a nude prepubescent female tied up with yellow rope and lying on her back on a bed. An adult male inserts his erect penis into the prepubescent female’s mouth and he also digitally penetrates her vagina. This movie file depicts a minor child identified by NCMEC (National Center for Missing and Exploited Children). The movie file is part of what is known as the “Jenny Series.”
 - b) **“BJAfileOfNow - 7yo Guat chick gets fucked in backseat and remains silent hussyfan r@ygold pthc 1yo 2yo 3yo 4yo**

5yo.mpg” is a movie file 6 minutes and 58 seconds in length that depicts a nude, prepubescent female lying on her back while her anus is being digitally penetrated by an adult male. During the movie the pre-pubescent female masturbates the adult male’s penis. The adult male then rubs his penis on the child’s vagina and anus before having anal intercourse with the child.

- c) **“(Pthc) Clodagh-Kloda (7Yo) & Dad Full (2007).mpg**” is a partial movie file downloaded from the user “willwll420” that is 1 minute and 39 seconds in length. The movie starts out with an adult male holding a prepubescent child by the arm in what appears to be a barn. The movie has a caption “Clodagh 7yo is “Barn Baby” (learning to play with a cock).” Then the movie shows what appears to the same girl in a bathing suit at the beach running and playing. The camera zooms in on the clothed child’s buttocks and vagina area. Then the movie moves again to the barn where an adult male pulls down his pants and forces the child to touch his penis.

9. SA Michael French caused a query of the American Registry for Internet Numbers (“ARIN”) online database to be conducted. This query revealed that IP address 98.169.189.115 was registered to the Internet Service Provider Cox Communications. Results from an administrative subpoena issued to Cox Communications by SA Michael French on or about November 2, 2010, for the date and time the files were downloaded revealed that on that day and at that time the IP address was assigned to the account registered to Willis Coley, 5840 Cameron Run Terrace Apartment 1027, Alexandria, Virginia 22303.

Subsequent Investigation

10. Various records and databases were searched for information regarding Willis

E. Coley:

- a. A search of CLEAR, a subscriber- only public records database, for Willis Coley revealed a Willis E. Coley, born in 1984. A public source real estate property search for the city of Alexandria, Virginia, revealed a Willis E. Coley is listed as residing at 5840 Cameron Run Terrace, Apartment Number 1027, Alexandria, Virginia 22303.
- b. North Carolina Department of Motor Vehicle (DMV) records indicate that Willis E. Coley currently is licensed and assigned North Carolina license number 21847951.
- c. On November 9, 2010, the United States Postal Inspection Service confirmed that Willis E. Coley is receiving mail at 5840 Cameron Run Terrace, Apartment Number 1027, Alexandria, Virginia 22303.
- d. An open source search for Willis Coley returned a website picturing an adult male. The text beside the image stated that Coley provided photography services at crime scenes for Army Criminal Investigative Command (CID) as well as other law enforcement agencies, and that he was in the Army. No location information was listed on the website. A query of the domain registration information through the website centralops.net revealed that the website is registered with the same address and telephone number that was listed in the Cox subpoena return.
- e. A search on Myspace.com for Willis Coley provided a Myspace page "mpwill." This Myspace page provides information regarding a

26-year-old white male who is in the Army. Associated with the Myspace profile is an AOL Instant Messenger profile whose name coincides with the password given to the undercover to access the password protected folders of "willwll420."

11. On 11/17/2010, agents from the FBI and Charlottesville Police Department executed a Federal search warrant at 5840 Cameron Run Terrace, Apartment 1027, Alexandria, Virginia 22303. While the agents were searching Coley's residence, Coley agreed to be interviewed. Coley provided the following information:

- a. COLEY admitted to using multiple publicly-available P2P file sharing programs to download and distribute child pornography, including the P2P program Det. Rudman utilized during his online undercover sessions on October 28, 2010.
- b. COLEY stated the username he used on the publicly-available P2P file sharing program utilized during Det. Rudman's online undercover sessions on October 28, 2010 was "willwll420".
- c. COLEY stated he knew what he was doing was illegal.
- d. COLEY admitted to knowing that he was trading child pornography with other peer-to-peer users.
- e. COLEY stated his child pornography is located on an external hard drive in a folder titled XXX. Coley also stated child pornography should also be on his apple laptop computer.
- f. COLEY admitted to sharing child pornography in various named password

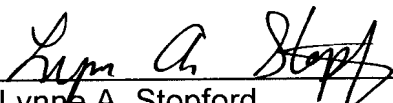
protected folders. COLEY provided some of his passwords to the interviewers. One of the passwords COLEY provided was the same password "willwl420" provided to Det. Rudman during the undercover online sessions on October 28, 2010.

12. During the execution of the above mentioned search warrant, a member of the search team was able to perform an on-site preview of a black external hard drive with an orange logo. The external hard drive was found to contain child pornography images and videos, to include a video depicting what appears to be a prepubescent female being penetrated anally by an adult male penis. The prepubescent female appears to be crying.

Conclusion

13. Based on the information set forth in this affidavit, I submit that there is probable cause to believe that on or about October 28, 2010, Willis E. Coley was knowingly transporting or shipping using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means,

including by computer, child pornography. All in violation of Title 18 United States Code, Section 2252A(a)(1).



Lynne A. Stopford
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
on this 17th day of November 2010.



Honorable B. Waugh Crigler
United States Magistrate Judge