

AUSA: Sara Woodward

Telephone: 313-226-9180

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Special Agent : Claudia Chechi

Telephone: 313-226-0590

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

MATTHEW DAVID KUPPE

Case:2:15-mj-30377

Judge: Unassigned,

Filed: 08-13-2015 At 10:43 AM

CMP USA V. MATTHEW DAVID KUPPE (LH)

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 August 1 to August 12, 2015, in the county of Oakland
in the Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. Section 1591
18 U.S.C. Section 2252A(a)(5)(B)
18 U.S.C. Section 2252A(a)(2)

Offense Description
Production of child pornography
Possession of child pornography
Receipt and distribution of child pornography

This criminal complaint is based on these facts:

Continued on the attached sheet.

Complainant's signature

DHS/HSI Special Agent Claudia Chechi
Printed name and title

Sworn to before me and signed in my presence.

Date: August 13, 2015

Judge's signature

City and state: Detroit, Michigan

R. STEVEN WHALEN, U.S. Magistrate Judge
Printed name and title

3. This affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant; therefore, this affidavit does not contain every fact that I have learned during the course of the investigation. I have set forth only those facts necessary to establish probable cause to believe that KUPPE has violated 18 U.S.C. § 2251(a) and 2252A(a)(2) and (a)(5)(B).

4. The information contained in this affidavit is based upon my personal knowledge, training, and experience, as well as the combined training and experience of other law enforcement officers with whom I have had discussions.

DETAILS OF INVESTIGATION

5. In August 2015, HSI Detroit received information from the Child Exploitation Investigations Unit (CEIU) Cyber Crimes Center (C3) regarding nude photographs of a young boys that were posted on a foreign image sharing website (“WEBSITE A¹”). The information provided to HSI Detroit indicated that WEBSITE A user “JCCLOCKERROOM” posted numerous nude photographs of young boys in a locker room setting. The photographs depicted the prepubescent boys’ genitalia.

6. An undercover officer exchanged emails with WEBSITE A user JCCLOCKERROOM via email address **jcclockerroom@gmail.com**. The

¹ The true name of “WEBSITE A” is known to your Affiant, but is not included in this

undercover officer asked **jclockerroom@gmail.com** about one of the boys depicted in the photographs posted on WEBSITE A. Below are some of the emails sent by **jclockerroom@gmail.com** to the undercover officer in August 2015:

- I only get to touch him a few times. I did bounce his naked body (butt) on my clothed dick today. . . I almost came in my pants lol
- I have not had a chance to suck his little cut cock yet . . . but I hope to be able to soon. When he was naked and bouncing on me, I was able to cup his cute little ass, and almost got a finger in his sweet tight hole. I also purposely dropped something, and made him pick it up, so I could see his tight hole.
DDo you have any pics?
- I played with the changing boys cock. I was able to get him hard, then he sat on my lap and I got hard. I licked my fingers and jacked him off for a few minutes, and he said it tickled. Then I felt him squirming around, and I think he had a dry orgasm. The whole time, I was bouncing him on my hard clothed dick, and I came in my pants. I have more pics, but you need to send some first. . . What would you do to these little boys (be graphic)

electronically filed public document in order to protect ongoing criminal investigations.

7. An HSI subpoena was issued to Google for subscriber information for **jclockerroom@gmail.com**. According to Google, the **jclockerroom@gmail.com** email account was access from an IP address assigned to AT&T U-Verse internet. The email account was active for approximately 4 days.

8. An HSI subpoena was issued to AT&T for subscriber information concerning the IP addresses used to access **jclockerroom@gmail.com**. AT&T informed HSI that all the logins used the same IP address, 76.229.248.66, and provided the following subscriber information: Richard Brad Kuppe of 2941 Remington Oaks Lane, West Bloomfield, Michigan 48324.

9. Law enforcement database and media checks identified MATTHEW KUPPE as a resident of 2941 Remington Oaks Lane, West Bloomfield, Michigan. Law enforcement also determined that MATTHEW KUPPE was employed at the Jewish Community Center (JCC) day camp.

10. In one of the photographs posted on WEBSITE A depicting a prepubescent child's penis, the shoe of the person taking the photograph is visible. On August 12, 2015, West Bloomfield Police conducted surveillance of MATTHEW KUPPE and saw him wearing shoes matching the shoe visible in one of the photographs on WEBSITE A.

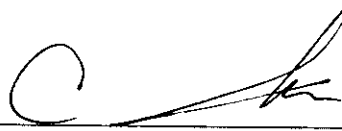
11. On August 12, 2015, a search warrant was executed at 2941 Remington Oaks Lane, West Bloomfield, Michigan. MATTHEW KUPPE was present during the execution of the warrant, and agreed to speak with your Affiant. After being advised of his rights, KUPPE stated:

- He is the user of **jclockerroom@gmail.com**
- He posted nude photographs on WEBSITE A depicting minor prepubescent boys
- He took the pictures he posted on WEBSITE A with his cell phone
- He has received child pornography from other internet users at his email account **jclockerroom@gmail.com**
- He provided consent for your Affiant to access **jclockerroom@gmail.com**

12. Your Affiant accessed **jclockerroom@gmail.com** and observed several emails received by **jclockerroom@gmail.com** that contained child pornography, including at least one, sent by other internet users.

13. Your Affiant has viewed the images taken by KUPPE and posted on WEBSITE A. Your Affiant is familiar with the definition of child pornography contained at 18 U.S.C. § 2256(8). It is your Affiant's opinion that many of images taken by KUPPE and posted on WEBSITE constitute child pornography.

14. Based upon the foregoing, there is probable cause to believe KUPPE has produced child pornography in violation of 18 U.S.C. § 2251(a), and possessed, received and distributed child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and (a)(2). Accordingly, your Affiant respectfully requests that this Court issue an arrest warrant.



Special Agent Claudia Chechi
Homeland Security Investigations/DHS

SUBSCRIBED and SWORN
before me on August 13, 2015



R. STEVEN WHALEN
United States Magistrate Judge