

AO 91 (Rev. 11/11) Criminal Complaint

FILED
VANESSA L. ARMSTRONG, CLERK

UNITED STATES DISTRICT COURT

DEC 19 2016

for the

Western District of Kentucky

**U.S. DISTRICT COURT
WEST'N. DIST. KENTUCKY**

United States of America)

v.)

Stephen Kyle Goodlett)

Case No. 3:16-MJ-668

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 Aug. 2005 through Oct. 13, 2016 in the county of Larue in the Western District of Kentucky, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2252A(a)(1)	Transportation of child pornography
18 USC 2252A(a)(5)(B)	Possession of child pornography

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



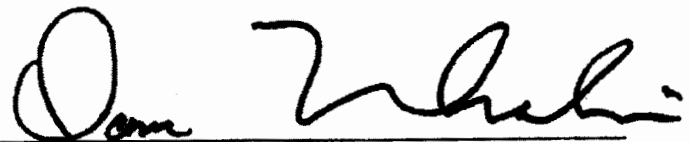
Complainant's signature

HSI Special Agent Brady Oberholtzer

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/19/2016



Judge's signature

City and state: Louisville, KY

U.S. Magistrate Judge Dave Whalin

Printed name and title

AFFIDAVIT FOR CRIMINAL COMPLAINT

1. Your affiant is an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. Affiant is a Special Agent ("SA") with the Department of Homeland Security (DHS), Homeland Security Investigations ("HSI"). I have been employed with DHS/HSI-OI since October, 2008, and I am presently assigned to Louisville, Kentucky. Prior to that, I was a police officer in Fargo, North Dakota, for 10 years and a Detective for 1 year in Miami Gardens, Florida. My duties include the investigation of various violations of federal criminal laws. I have attended the Federal Law Enforcement Training Center (FLETC) where training was conducted pertaining to these types of investigations.

3. This affidavit is based upon my personal knowledge and upon information reported to me by federal and local law enforcement officers and others with knowledge of the case. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

4. This affidavit is submitted in support of an application seeking an arrest warrant for Stephen Kyle Goodlett. Your Affiant alleges that the facts and circumstances outlined in this affidavit provide sufficient probable cause to believe that in or about and between August, 2005, and October 13, 2016, Goodlett transported and possessed child pornography in violation of Title 18, United States Code Sections 2252A(a)(1), (a)(5)(B), (b)(1) and (b)(2).

FACTUAL BASIS

5. On September 2, 2016, Elizabethtown Police received a child sexual exploitation complaint. The complainant, KM (DOB: 3/21/1996), stated that someone informed her that nude photographs of her were uploaded to [REDACTED]. KM told police she was 15 when she created the nude photos with her cell phone for her boyfriend.

6. The website [REDACTED] is based in Russia. "Anon-ib" is short for "anonymous image board" and is used to anonymously post photographs online. Many of the photographs are self-taken and depict nudity. The photographs are often accompanied by the first and last initial of the person in the photographs.

7. Elizabethtown Police requested and received detailed IP address information regarding the IP address responsible for uploading the images related to KM from the website. Elizabethtown Police learned that IP address 68.34.215.61 was responsible for the uploads and discovered through an online investigative tool that the subject IP address belonged to a Comcast Cable account.

8. In response to a subpoena, Comcast provided registration information regarding IP address 68.34.215.61. The account was registered by Kyle Goodlett of [REDACTED], Elizabethtown, KY. Goodlett was the Assistant Principal at Larue County High School from July 4, 2012, until he was promoted to the Principal position on July 1, 2013, he held that position until he was terminated on October 19, 2016. Goodlett was Principal while KM was a student there and he had access to the nude images of KM when he confiscated her cell phone. KM was a student at Larue County High School from 2010 until she graduated in 2014.

9. On October 13, 2016, the Kentucky State Police (KSP) executed a search warrant at Goodlett's residence. An on scene preview of Goodlett's electronic devices, including his iPhone and an external hard drive, yielded 60 files of child sexual exploitation that he possessed. Goodlett provided his password to KSP and the Apple identification was registered to KGoodlett@Comcast.net.

10. On December 12, 2016, KSP received a report from the National Center for Missing and Exploited Children stating that several images discovered in Goodlett's Dropbox account were part of a known series of images with an identified minor victim. Dropbox is a personal cloud storage service headquartered in San Francisco, California, that is used for file sharing. Items placed in a user's Dropbox account are stored on servers owned and operated by Dropbox. Items placed in a Dropbox account can be accessed from numerous devices and shared with others via links to specific files or folders. KSP has determined the Dropbox account contained images of known victims to include KM and five images from an identified minor female.

11. I have reviewed the images from Goodlett's Dropbox account and confirmed them to be child pornography as defined by 18 U.S.C. § 2256(8)(A). Below is a description of three of the images of the same identified minor female from the Painted Roses series:¹

Image 1 depicts a minor female approximately 10-14 years old standing in front of a mirror fully nude with her leg propped up on a bathroom sink exposing her vagina. The image shows her naked breasts and vagina.

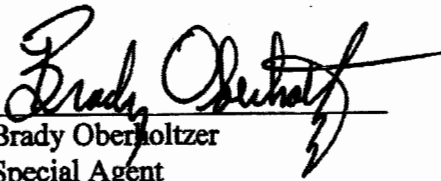
Image 2 depicts a fully nude minor female approximately 10-14 years old seated on the floor, leaning slightly forward, looking into the camera with her legs spread open and her knees up exposing her vagina and showing her naked breasts.

Image 3 depicts a fully nude minor female approximately 10-14 years of age laying down fully nude with the focal point being her vagina and anus in the foreground and her face in the background.

¹ Copies of the described images were made available for the Magistrate Judge to review and will be kept in a secure location by Affiant.

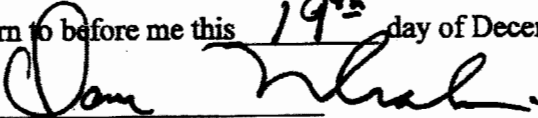
12. Goodlett signed a waiver of his rights and agreed to a recorded interview with KSP Detectives. Goodlett admitted to KSP that he had an addiction to pornography and that he transferred images from phones confiscated from students to his personal thumb drive without their consent or knowledge. Goodlett stated he would take the images and share them to the [REDACTED] website with the intent of trading for more images. Goodlett told KSP he used his iPhone and laptop to view the images.

13. Based on the above information, Affiant believes that Stephen Kyle Goodlett is in violation of 18 USC §§ 2252(A)(a)(1), (a)(5)(B), (b)(1), and (b)(2) for transportation and possession of child pornography.



Brady Oberholtzer
Special Agent
Homeland Security Investigations

Sworn to before me this 19th day of December, 2016.



DAVE WHALIN
United States Magistrate Judge