

**AFFIDAVIT IN SUPPORT OF  
A SEARCH WARRANT APPLICATION**

I, Martin J. Conley, being first duly sworn, hereby state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of applications for a search warrant for information associated with a Skype account, stored at premises controlled by Microsoft Corporation, a message provider headquartered at Redmond, Washington. The information to be searched is described in the following paragraphs and in Attachment A. The search warrant, to be issued under 18 U.S.C. § 2703(a), (b)(1)(A) and (c)(1)(A), will require Skype to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been since 2011. Prior to my employment with HSI, I was employed as a SA with the United States Secret Service from 2004 to 2011. I have participated in numerous criminal investigations, to include matters involving the sexual exploitation of children. In my career, I have used various investigative tools and techniques including search warrants for electronic information in the possession of service providers.

3. This affidavit is intended to show that there is sufficient probable cause for the requested warrant. Based on my training and experience and the facts as set forth in this affidavit, I submit that probable cause exists to believe that violations of 18 U.S.C. §§ 2251(c) (sexual exploitation of a child outside the United States); 2251(e) (attempt and conspiracy to violate § 2251(c)); 2252A(a)(3)(B) (promotion of child pornography); 2252A(b)(1) (conspiracy

to promote child pornography); 2260(a) (production of sexually explicit depictions of a minor for importation into the United States); and 2260(c)(1) (attempt and conspiracy to violate § 2260(a)) have been committed by the individual using the below listed Skype accounts (Skype Name/ID):

Ana Mack (Skype ID: **anamarie053**)<sup>1</sup>

I further submit that there is probable cause to search the information described in Attachment A for evidence of these crimes, further described in Attachment B.

### **JURISDICTION**

4. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. § 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States ... that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

5. Based on my review of public information and my conversations with the United States Attorney’s Office for the District of Maine, I am aware that Title 18, United States Code, Section 2251(c) prohibits the sexual exploitation of a child outside the United States. Subsection (c)(1) provides in relevant part, “Any person who, in a circumstance described in paragraph (2), employs, uses, persuades, entices, or coerces any minor to engage in ... sexually explicit conduct outside of the United States ... for the purpose of providing any visual depiction of such conduct,” commits a criminal offense. Subsection (c)(2) provides that the circumstances referred to in subsection (c)(1) are that either (1) the person intends the visual depiction to be transported to the United States by any means, or (2) the person transports the visual depiction to the United

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<sup>1</sup> A Skype Name/ID is a unique username that is created when a user first signs up for Skype and cannot be changed. A Display Name, by contrast, is the full name on a user’s profile, and can be modified by the user. The Display Name is what a user’s contacts see when they add the user as a contact. Because a Skype Name/ID is unique, while a Display Name is not, I will refer to the user who is the subject of this warrant application by the user’s Skype Name/ID.

States by any means. Subsection (e) subjects individuals who violate subsection (c), or attempt or conspire to do so, to imprisonment and/or fines.

6. I am also aware that Title 18, United States Code, Section 2252A(a)(3)(B) prohibits the promotion of child pornography. The statute provides in relevant part, “Any person who ... advertises, promotes, [or] presents ... in or affecting interstate or foreign commerce by any means ... any material or purported material in a manner that reflects the belief, or that is intended to cause another to believe, that the material or purported material is, or contains ... a visual depiction of an actual minor engaging in sexually explicit conduct,” commits a criminal offense. Section 2252A(b)(1) subjects individuals who violate subsection (a)(3)(B), or attempt to conspire to do so, to imprisonment and/or fines.

7. I am also aware that Title 18, United States Code, Section 2260(a) prohibits the production of sexually explicit depictions of a minor for importation in the United States. The statute provides in relevant part, “A person who, outside the United States, employs, uses, persuades, entices, or coerces any minor to engage in ... sexually explicit conduct ... for the purpose of transmitting a live visual depiction of such conduct, intending that the visual depiction will be imported or transmitted into the United States,” commits a criminal offense. Subsection (c)(1) subjects individuals who violate subsection (a), or attempt or conspire to do so, to imprisonment and/or fines.

### **BACKGROUND**

8. Since 2012, I have been investigating individuals in the Philippines who sell live streaming webcam shows involving the sexual abuse and exploitation of children to paying customers worldwide. These investigations are conducted mainly through undercover communications used to infiltrate closed communities of offenders. This growing child abuse

industry involves child traffickers in the Philippines who collect viewership fees from vetted customers worldwide. Paying customers are allowed to direct the abuser/child trafficker to perform acts of sexual abuse on minor children in real time during a private webcam interaction. Undercover (U/C) operations associated with this case originated in Portland, Maine, and included the collaboration of HSI Attaché Manila and law enforcement entities in the Philippines.

9. I have traveled to the Philippines on several occasions as part of my investigative work. While in the Philippines, I have engaged in U/C meetings with child sex traffickers. I have met on numerous occasions with Philippine law enforcement agents and prosecutors. I have testified on four separate occasions as a witness for the Republic of the Philippines regarding my investigative involvement on cases brought before the Regional Courts in Manila and elsewhere.

10. “Operation Corregidor” was created to manage these investigations. Operation Corregidor is run out of HSI Portland, Maine.

#### **PROBABLE CAUSE**

11. On September 20, 2021, HSI Portland provided information to HSI Attaché Frankfurt concerning Tormod Jøran KARLSSON, a citizen of Sweden residing in Norway. KARLSSON was identified through Operation Corregidor as a suspect of child abuse offenses perpetrated on minor victims in the Philippines. Investigation revealed that KARLSSON communicated with and financially compensated child sex traffickers in the Philippines. HSI Frankfurt provided investigative findings to the National Criminal Investigative Service (NCIS) in Norway. KARLSSON was subsequently arrested by Kripos NCIS Norway - Sexual Offenses Section, for committing the child sexual abuse offenses documented in HSI Portland’s investigative referral.

12. Kripos NCIS Norway's continued investigation of KARLSSON revealed additional communications and child abuse activity linked with child sex traffickers not known to Operation Corregidor. Specifically, NCIS Norway located communications and child sex abuse material (CSAM) associated with the user of Skype Name/ID "**anamarie053**" (Display Name: Ana MACK). NCIS Norway, through official information-sharing channels, provided these findings to HSI Portland, Maine on May 24, 2022.

13. On August 6, 2020, HSI Portland provided information to HSI Attaché Frankfurt concerning Swedish National Krister ANDERSSON. ANDERSSON was identified through Operation Corregidor as a suspect of child abuse offenses perpetrated on minor victims in the Philippines. Investigation revealed that ANDERSSON communicated with and financially compensated child sex traffickers in the Philippines. HSI Frankfurt provided the lead information to the Swedish Police Authority (SPA). ANDERSSON was subsequently arrested by Swedish authorities in June of 2020 for committing the child sexual abuse offenses documented in HSI Portland's investigative referral. ANDERSSON was later convicted on multiple charges concerning the rape of a child, aggravated sexual abuse and possession, production, and dissemination of CSAM.

14. On August 20, 2021, the SPA reported that ANDERSSON had been sentenced to eight years imprisonment, the maximum penalty under Swedish law.

15. The SPA, through its investigation of ANDERSSON, identified communications and child abuse activity linked to suspected child sex trafficker and the user of Skype Name/ID "**anamarie053**" (Display Name: Ana MACK). SPA's investigation revealed 10 victims associated with the user of the Skype account, whom I will call "SUSPECT" in this affidavit, through media content located on ANDERSSON's electronic devices.

16. The SPA shared investigative findings with HSI Portland through official channels and requested investigative assistance from me to infiltrate SUSPECT's child sex trafficking ring.

17. Starting on about May 23, 2022, I communicated with SUSPECT in an undercover (U/C) capacity via Skype text and video chat. During the ensuing communications with me, SUSPECT offered to provide sexually explicit live webcam shows involving underage female children in return for cash remittances. SUSPECT subsequently shared historical media files of CSAM via Skype that she produced previously for other customers. SUSPECT instructed me to send payments to her through the money remitter PayPal.

18. As part of this investigation, I requested to see SUSPECT in front of the camera as well as the solicited children in an appropriate manner – clothed and waving to me. This technique allowed me to identify SUSPECT as an adult Filipina female, multiple underage victims, and attributes relating to the physical location of SUSPECT.

19. To illustrate a typical Skype conversation between me and SUSPECT, below is a representative sample of a chat, with SUSPECT using her “**anamarie053**” Skype account. The below chat occurred on two days; May 23, 2022, and May 29, 2022, while I was in Maine:<sup>2</sup>

May 23, 2022

**ANAMARIE053**, 6:42 PM

Pag first

**ANAMARIE053**, 6:43 PM

Or lets delanlike this

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<sup>2</sup> All grammatical errors were in the original chats. Emoticons, symbols often used in instant messaging to convey emotion, have been removed. The HSI undercover screen name has been replaced with “HSI UCA.”

**HSI UCA, 6:43 PM**

Oh ofcourse bb

**ANAMARIE053, 6:43 PM**

I send u videos usend me pay

**HSI UCA, 6:43 PM**

U collect my pay first

**HSI UCA, 6:43 PM**

I wBt u to trust me

**ANAMARIE053, 6:43 PM**

I not calma ng you g till i sure u send

**ANAMARIE053, 6:43 PM**

Oki

**HSI UCA, 6:43 PM**

Yes bb I understand that's ok to me

**ANAMARIE053, 6:44 PM**

Thdn send now

**HSI UCA, 6:44 PM**

If u honezt and true ill be good customer bb

**HSI UCA, 6:44 PM**

Sendinf now

**ANAMARIE053, 6:44 PM**

So the girl 7yo will came here

**ANAMARIE053, 6:44 PM**

Lol see

**ANAMARIE053, 6:44 PM**

I never lie u know thT

**ANAMARIE053, 6:44 PM**

Bcoz i know u know me

**ANAMARIE053**, 6:45 PM

And u will not add me here if u not know me yet

**HSI UCA**, 6:47 PM

Check it bb

**HSI UCA**, 6:47 PM

I sent

**ANAMARIE053**, 6:50 PM

Already!

**ANAMARIE053**, 6:50 PM

Let me check first

**HSI UCA**, 6:52 PM

I sent twice on accident haha

**HSI UCA**, 6:52 PM

U will get extra hope u treat me right for it bb

**ANAMARIE053**, 6:53 PM

Oki i call the girl now

**ANAMARIE053**, 6:54 PM

While we wait the girl

**ANAMARIE053**, 6:54 PM

Wwant me to send u cideo

**ANAMARIE053**, 6:54 PM

You g suck dick

**HSI UCA**, 6:55 PM

Not now bc im at work in meeting bb

**HSI UCA**, 6:55 PM

I trust u we can do show later

**HSI UCA**, 6:55 PM

If u have vid I'll see bb mmm



**HSI UCA**, 6:56 PM

Long as it's one if your young. I'm not interested in girls u don't k iw for real bb

**ANAMARIE053**, 6:58 PM

I know all the girls

**ANAMARIE053**, 6:58 PM

They near to me

May 29, 2022

**HSI UCA**, 12:01 PM

Bb whos dick she suck? Mmm

**ANAMARIE053**, 12:01 PM

A 15 boy

**ANAMARIE053**, 12:01 PM

I send u 2 fifferent videos of her she sucking dick

**HSI UCA**, 12:02 PM

Where he cum in the video?

**ANAMARIE053**, 12:02 PM

Mouth

**HSI UCA**, 12:02 PM

Wow

**HSI UCA**, 12:04 PM

I dont want u to make new vid bc I want to pay for live. But I do want the vids u have already mmm

**HSI UCA**, 12:04 PM

U have two vids her sucking and cum?

**ANAMARIE053**, 12:04 PM

Hmmm yes i have

**HSI UCA**, 12:05 PM

She ur daughter bb? She's beautiful

**ANAMARIE053**, 12:05 PM  
Ty

**ANAMARIE053**, 12:05 PM  
Friend daughter

20. On May 31, 2022, and other dates, I used a purchase of evidence (POE) expenditure to further the investigation of SUSPECT. Prior to the expenditure, I explained that I could not view a live show at that time but would send an advance payment for a future viewing. In response via Skype, SUSPECT sent me historical videos depicting underage females engaged in sex acts.

21. In several of the videos sent by SUSPECT, an adult is seen grabbing the back of a prepubescent female's head and forcing her to perform oral sex on a male subject. The child is forced to open her mouth as the male ejaculates into her mouth and on her face. The identity of the abuser(s) is not within the observable frame, however, SUSPECT stated to me that she is the person in the videos forcing the child to perform oral sex. According to SUSPECT, the child depicted in the videos is seven years old.

22. In other videos sent by SUSPECT, an adult uses sex toys and foreign objects to sodomize prepubescent females. SUSPECT stated she was the abuser and person responsible for filming the sex acts in all historical videos provided to me.

23. To date, SUSPECT has sent 16 sexually explicit historical videos to my undercover Skype account.

24. On June 1, 2022, a preservation request was submitted to Microsoft, Inc. under 18 U.S.C. § 2703(f), requesting that Microsoft preserve all stored communications, records and other evidence relating to the Skype Name/ID: **anamarie053** (Display Name: Ana MACK).

25. This investigation revealed that SUSPECT has likely been selling live sexual abuse of children for at least several years to a global network of customers, to include U.S.-based buyers.

### **BACKGROUND CONCERNING SKYPE**

26. In my training and experience, as well as from my review of publicly available information, I know that Skype is a software product that allows users to conduct video chats and voice calls over the internet. Skype users can also send instant messages, exchange files and images, send video messages, and create conference calls. Skype software is available for use on personal computers as well as smartphones and tablets. Skype was first released in 2003. It was acquired by Microsoft in 2011 and is now a division of Microsoft Corporation.

27. Skype's privacy policy, which is available at <https://privacy.microsoft.com/en-US/privacystatement>, states that Microsoft can collect the content of files and communications that a user inputs, uploads, receives, creates and controls. This can include the contents of chats.

28. According to support information provided by Microsoft, Skype no longer saves data on local devices, but all chat history, files, video messages, recordings, etc. are stored in the cloud. How long some items are available in one's chat history is determined by the user, but others, such as files, voice messages and call recordings, are available for 30 days. Thus, depending on when a chat occurred and the preferences of a particular user, it is possible that the content of chats will be found on servers controlled by Microsoft. See <https://support.skype.com/en/faq/FA34893/how-long-are-files-and-data-available-in-skype>.

29. Skype allows subscribers to create user accounts and create a unique member name. The user can change this username at any time. The Skype ID associated with the Skype account, by contrast, cannot be changed by the user. For example, Skype member "Ana MACK"

could change the member name to another series of letters, numbers or symbols, but the Skype ID, “**anamarie053**,” would remain the same.

30. A Skype subscriber can also store contact lists on servers maintained and/or owned by Microsoft. In my training and experience, evidence of who was using an online account, such as Skype, may be found in address books or contact lists.

31. Based on information provided by Skype to law enforcement, in addition to the content of text messages, chat content, and contact information, the following types of information will also be provided upon receipt of appropriate legal process:

- Registration Details: information captured at time of account registration;
- Billing Address: User provided billing addresses;
- Skype Online Current Subscription: List of Skype Online numbers currently subscribed to by a User;
- Purchase History: Financial transactions conducted with Skype including billing addresses provided;
- Skype Out Records: Historical call detail records for calls placed to the public switched telephone network (PSTN);
- Skype Online Records: Historical call detail records for calls placed from the public switched telephone network (PSTN);
- SMS Records: SMS text message historical detail records;
- Skype Wi-Fi Records: Historical Skype Wi-Fi records; and
- E-mail & Password Records: Historical record of e-mail and password change activity.

32. Chat content on Skype’s servers will enable investigators to identify customers (who, as noted above, directly participate in the abuse of children by directing the activity), as well as additional co-conspirators. SUSPECT’s contact list will likewise serve to identify customers and other co-conspirators.

**CONCLUSION**

33. Based on the forgoing, I submit that probable cause exists to believe that the user of Skype account Skype Name/ID: **anamarie053** (Display Name: Ana MACK) listed in Attachment A, has committed violations of 18 U.S.C. §§ 2251(c) (sexual exploitation of a child outside the United States); 2251(e) (attempt and conspiracy to violate § 2251(c)); 2252A(a)(3)(B) (promotion of child pornography); 2252A(b)(1) (conspiracy to promote child pornography); 2260(a) (production of sexually explicit depictions of a minor for importation into the United States); and 2260(c)(1) (attempt and conspiracy to violate § 2260(a)). I further submit that probable cause exists to believe that evidence of these offenses will be found in information stored by Microsoft. I therefore request that the Court issue the proposed search warrant. Because the warrant will be served on Microsoft, which will then compile the requested records at a time convenient to it, I submit that reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.


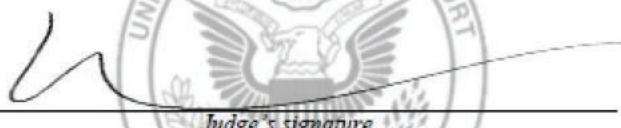
Dated at Portland, Maine this 10th day of June, 2022.

  
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Martin J. Conley  
Special Agent  
Homeland Security Investigations

Sworn to telephonically and signed electronically in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedures

Date: Jun 10 2022

City and state: Portland, Maine

  
  
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Judge's signature  
Karen Frink Wolf, U.S. Magistrate Judge  
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Printed name and title