

CONTINUATION IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Aaron Eastham, am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since 2018. I am currently assigned to the Detroit Field Office, Grand Rapids Resident Agency. During my employment with the FBI, I have conducted investigations involving violations of federal criminal laws, including violations related to child exploitation and pornography. I am familiar with the various statutes of Title 18, United States Code, Chapter 110 - sexual exploitation and other abuse of children, including violations pertaining to sexual exploitation and attempted sexual exploitation of children (18 U.S.C. § 2251(a)) and possession of child pornography (18 U.S.C. § 2252A(a)(5)(B)), the "subject offenses."

2. The facts in this Continuation of Criminal Complaint are based on my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. I submit the following to establish probable cause to believe that Robert Alan Mark ("MARK" or "Defendant") has committed violations of sexual exploitation and other abuse of children, including violations pertaining to sexual exploitation and attempted sexual exploitation of children (18 U.S.C. § 2251(a)) and possession of child pornography (18 U.S.C. § 2252A(a)(5)(B)), the "subject offenses." This Continuation of Criminal Complaint is intended merely to show probable cause that MARK committed the described offenses below and does not set forth all of my knowledge concerning this matter.

PROBABLE CAUSE

3. A Michigan State Police sergeant, James Lutrull, who volunteered with Scouting America (the "Scouts"), was informed by another volunteer, who wished to remain anonymous, that about 10 years ago, they observed ROBERT MARK recording underaged girls in their bathing suits at a Scouts event at a waterpark. This did not get reported to the Scouts at the time because the anonymous volunteer did not know that MARK was associated with the Scouts at that time. In 2019, during another Scouts event at a pool, the anonymous volunteer again observed MARK recording minor females in their bathing suits. At this time, the volunteer knew MARK was a volunteer with the Scouts and reported this incident to Scouting America.

4. Because of what the anonymous volunteer told him, Lutrell began watching MARK, who was then a Crew Leader with the Scouts. Around August 3, 2025, during a Scouts event, Lutrull observed MARK pointing his phone under the picnic table he was sitting at, for 2-3 minutes at a time, appearing to record the genital area of two minor girls who were 13 and 14 years old (the 14 year old female will hereby be called Minor Victim 1 or "MV1"). This happened several times over 30-45 minutes. The girls were wearing short skirts at the time.

5. On August 19, 2025, investigators interviewed MV1's parents. Lutrell told them that he had observed MARK appearing to record their daughter at the August 3, 2025 Scouts event. MV1's parents then watched MARK at the next Scouts event and saw MARK appear to record a group of children and then follow MV1 with his phone when

she walked away from the group. MV1's parents reviewed MV1's phone and found that MARK had been messaging MV1 on her phone, which was against Scouts policy, but they did not find any sexually explicit messages. MV1's parents were aware that MARK hosted pool parties at his house for the last 2-3 years, for the all-girls Scout Troop. Two years ago at one of these pool parties, MARK told MV1 that she could change and shower in his bathroom.

6. Around August 22, 2025, investigators talked with a representative from the Scouts, who informed them they received a tip on August 19, 2025, from an adult female (later identified as a victim of MARK when she was a minor, and will hereby be referred to as "MV2") regarding MARK taking photos of the girls since 2021. The tip also alleged that MARK would often hold his phone pointing at them, take screenshots of their social media, and make them feel uncomfortable.

7. Investigators interviewed MV2. In 2019, MV2 was a minor in all-girl Scouts troop with MARK's daughter. MV2 noticed MARK appearing to point the camera of his phone in a way that indicated he was recording up girls' skirts. When MV2 was 16 years old, MARK sent her a message on Snapchat saying "Look'en good! Sexy!" in response to one of the photos on her Snapchat story. MV2 said that the Scouts had a lot of events at MARK's house. She and the other girls would change and shower in the bathroom when they went swimming at his house. MARK would always have his phone out when the girls were swimming.

8. On August 26, 2025, investigators executed a search warrant on MARK's residence in Whitehall, MI. Investigators seized several electronic devices from MARK's home, including the following:

- a. a black Samsung Galaxy S24 Cellphone, SN: R5CX917NBMB
- b. miscellaneous SD & Micro SD Cards
- c. (2) small black cameras with mounts, containing Micro SD cards
- d. blue AT&T LG Xpression cellular phone
- e. (2) black power adapters with built-in cameras (Model #: Mee007)
- f. (5) white plastic command hooks with built-in cameras and
- g. black LG Thor custom computer tower, SN: 11147053102000365

9. MARK was at the residence at the time of the search. Investigators read MARK his Miranda rights and agreed to answer questions. MARK admitted to recording girls on and off since 2019. He also admitted to reaching out to MV2 and commenting that she was looking sexy. MARK said he didn't think he ever captured any nudity while recording the girls. He denied viewing and saving CSAM. He denied inappropriately touching the girls and he denied taking videos of his own children.

10. Investigators forensically extracted MARK's black Samsung Galaxy S24 cellphone, SN: R5CX917NBMB. There was a folder labeled "My Vault" on the phone. Within the "My Vault" folder, there were folders labeled with two or three letters, which matched the initials of the identified minor female victims in pictures or videos within the folders.

11. At least (60) of the videos in the “My Vault” folder showed female children in either a bathroom or bedroom showering, undressing from bathing suits, changing into regular clothing, undressing to use the toilet, and/or stepping out of the shower in a bathing suit or nude to then change into regular clothing. Some of their nude genital and/or buttock areas are exposed to the camera while changing, and many videos were found to have been recorded at groin level. These females appeared to be between the ages of twelve and seventeen.

12. Six of the children in the videos were Scouts members. Investigators identified two additional victims as friends of MARK’s daughter, who were minors at the time the videos were recorded.

13. The “Modified” metadata for these videos ranged from October-December 2024.

14. Within a folder labeled with MV1’s initials, investigators found a video which depicted MV1 entering the bathroom and removing her bathing suit bottoms to use the toilet. The camera is positioned at the base of the toilet, angled upward facing the shower. As she is sitting down, her genitals are visible to the camera. After she finished using the toilet and pulled up her bathing suit bottom, MARK entered the bathroom and appeared to show MV1 how to adjust the shower. After he exited the bathroom, MV1 removed her bathing suit and her genitals were exposed. Investigators found a related video which was an 11-second clip depicting only the portion of the above-described video when MV1 sat down on the toilet and exposed her vagina, played in slow motion.

15. Another video of MV1 was recorded from a camera inside of the shower. The video captured MV1 completely nude, with her genitals exposed, while she is washing herself. Her genitals appear to be the focal point of the video. At one point in the video, she turns away from the camera and spreads her buttocks toward the camera, exposing her anus. There was no creation date found in the metadata for the videos. However, the “modified” date was October 16, 2024, which indicates the video was likely created on or prior to that date. MV1 was 13 years old on the modified date.

16. There were multiple videos of MV2 on MARK’s cell phone. The videos depicted MV2 in a bathroom and were taken with cameras located on top of or behind the sink, in the shower, and at the base of the toilet. The videos capture MV2 taking off a bathing suit, showering, and then getting dressed again. Several of the videos captured MV2 completely nude with her genitals exposed. There was no creation date found in the metadata for the videos. However, the “modified” date was October 16, 2024, which indicates the video was likely created on or prior to that date. MV2 was 17 years old on the modified date.

17. There were multiple nude videos of MV3 on MARK’s cell phone. The videos depicted MV3 in the bathroom, removing a bathing suit, and showering. The videos were taken from multiple cameras from outside and inside of the shower. In one video, MARK showed MV3 how to use the shower. One of the cameras in the shower was directed at the pubic area of MV3 and captured close up visuals of MV3’s labia. There was no creation date found in the metadata for the videos. The modified date for the

videos was October 16, 2024, which indicates the video was likely created on or prior to that date. Investigators identified MV3 and determined that she was 13 years old on the modified date.

18. There were multiple videos of MV4 on MARK's cell phone. The videos depicted MV4 in the bathroom, removing a bathing suit, and showering. The videos were taken from multiple cameras from outside and inside of the shower. In one video, MARK showed MV4 how to use the shower. One of the cameras in the shower was directed at the pubic area of MV4 and captured close up visuals of MV4's labia. There was no creation date found in the metadata for the videos. The modified date for the videos was October 16, 2024, which indicates the video was likely created on or prior to that date. Investigators identified MV4 and determined that she 12 years old on the modified date.

19. There were multiple videos of MV5 on MARK's cell phone. The videos depict MV5 in the bathroom, removing a bathing suit, sitting on the toilet and showering. The videos were taken from multiple cameras from outside and inside of the shower. In one video, taken from the camera positioned at the base of the toilet, MV5 exited the shower and, as she steps out of the tub, she lifted her leg exposing her vagina to the camera. A related video contained a 7-second clip of the portion of this video in which MV5 raised her leg while stepping out of the shower and expose her vagina to the camera. The video was in slow motion and "boomerangs," which means it plays forward and then is shown playing in reverse. There was no creation date found in the metadata for the videos. The modified date for the videos was October 16, 2024, which indicates the

video was likely created on or prior to that date. Investigators identified MV5 and determined that she 16 years old on the modified date.

20. There were multiple videos of MV6 on MARK's cell phone. The videos depict MV6 in the bathroom, removing a bathing suit, and showering. The videos were taken from multiple cameras from outside and inside of the shower. A video from inside the shower captured MV6 nude. A camera positioned inside of the shower at a height that was aimed at her genital region. When MV6 turned and faced the camera with her legs closed, the video captured her pubic region. There was no creation date found in the metadata for the videos. The modified date for the videos was October 16, 2024, which indicates the video was likely created on or prior to that date. Investigators identified MV6 and determined that she 17 years old on the modified date.

21. On November 17, 2025, after MARK was arrested for related state charges, MARK waived his Miranda rights and spoke with investigators again. MARK admitted to using the Command hooks and phone charger hidden cameras to record girls when he had Scouts pool parties at his residence. He did not know the exact ages of the girls, but he knew they were between 10 and 18 years old. He directed the girls to use the bathroom in which he had placed the hidden cameras.

22. MARK admitted to organizing the videos by specific person and that he used the videos for sexual gratification.

23. The Samsung Galaxy S24 cellphone used by MARK was manufactured outside of the state of Michigan.