

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI**

**IN THE MATTER OF A CRIMINAL  
COMPLAINT OF:  
MARK JOHN MILLMAN AND  
TARA SAU MILLMAN**

**Case No. 21-mj-2004DPR-01/02**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Jeremy Bluto, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent (SA) with Immigration and Customs Enforcement (ICE)/Homeland Security Investigations (HSI), Kansas City, Missouri, Principle Field Office, and have been so employed since April 25, 2010. I am currently assigned as a criminal investigator for HSI. Prior to my current position, I was employed with U.S. Customs and Border Protection, Office of Border Patrol, as a Border Patrol Agent and a Supervisory Border Patrol agent for five years, and a Deputy Sheriff with the Taney County, Missouri, Sheriff's Department for three years. Prior to my employment in Missouri, I attended California State University, Fullerton, and received a bachelor's degree in Criminal Justice.
2. As part of this affiant's duties with ICE/HSI, this affiant investigates federal criminal violations including violations relating to child exploitation, child pornography, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422.
3. The statements in this affidavit are based on personal observations, my training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this affiant has not included each and every fact known to me concerning this investigation. The affiant has set forth the facts necessary to establish probable cause to believe that Mark John Millman and

Tara Sau Millman have violated 18 U.S.C. § 2251(a), that is, sexual exploitation of a minor.

**STATUTORY AUTHORITY**

4. 18 U.S.C. § 2251(a) prohibits a person from employing, using, persuading, inducing, enticing, or coercing a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce, or if such visual depiction actually was transported in or affecting interstate commerce.

**PROBABLE CAUSE**

5. In July 2019, agents with the HSI San Diego, California, Field Office began investigating users on a communications and cloud storage platform identified as “Cloud Platform A” for purposes of this affidavit. Cloud Platform A provides communication services to a global audience and can be accessed from all major devices. Cloud Platform A provides encrypted, cloud-based services that enable private, secure online storage, communication, and collaboration for business and individuals. During the investigation, the agents accessed a weblink to an encrypted chat room within Cloud Platform A, which was created on May 20, 2020, and the chat room had approximately 145 registered users. The HSI San Diego agents confirmed that there were files containing child pornography, that is, children less than 18 years of age engaged in sexually explicit conduct, uploaded/posted by participants in the chat room dating back to on or about May 20, 2020.
6. One of the users identified in the Cloud Platform A chat room was a registered user with account username “mark millman” and registered email “mark\_millman@yahoo.com” (hereinafter “Millman Account”). On June 15, 2020, an image was uploaded by a user within the chat room on Cloud Platform A. The image depicted a prepubescent female, approximately 11 years of age,

naked with her breasts and vagina exposed, standing in front of a mirror. The Millman Account commented “Very Nice.” On June 17, 2020, the Millman Account posted a message in the chat room that read, “Anyone into baby?” Another user responded, “Prefer a bit older, sorry,” to which the Millman Account responded, “It’s all good.”

7. Pursuant to a request from law enforcement, Cloud Platform A provided multiple login IP addresses associated with the Millman Account, including IP address 47.214.16.149 (Port 49749) used on June 6, 2020, at 06:55 hours, GMT, which was a Suddenlink Communications IP address. On August 3, 2020, Suddenlink Communications responded to a law enforcement request for subscriber information and identified the subscriber for IP address 47.214.16.149 on the date and time listed above as S.W., with a service address in Merriam Village, Taney County, Missouri 65740.
8. On January 21, 2021, this affiant applied for and received a search warrant for the service address in Merriam Village associated with S.W.’s Suddenlink account. On January 28, 2021, this affiant, and other members of HSI and the Southwest Missouri Cyber Crimes Task Force (SMCCTF), executed the search warrant. Upon arrival, law enforcement knocked on the door and contacted Tara Sau Millman (hereinafter “Tara”). Tara was provided with a copy of the search warrant and stated that Mark John Millman (hereinafter “Millman”) was her husband. She explained he had left to go to the convenience store and would be right back. Approximately five minutes later, Millman returned to the residence and parked his vehicle partially in the yard of the residence. HSI and SMCCTF TFO Joseph Neuschwander contacted Millman in his yard and seized Millman’s cellular phone, an Apple iPhone, from Millman’s vehicle.
9. This affiant contacted Millman and asked him to come to this affiant’s vehicle to discuss the search warrant. This affiant, HSI and SMCCTF TFO Brian Martin, and Millman entered the vehicle.

Post-*Miranda*, Millman stated he used several social media platforms; however, he denied any knowledge of child pornography. A forensic preview of Millman's Apple iPhone was conducted by SMCCTF Computer Forensic Examiner (CFA) Michael Costello, and images and videos of child pornography were located. Millman was confronted with what was located on his cellular phone, and he admitted that he did view child pornography. He stated he mainly used Telegram. This affiant is aware that Telegram is a freeware, cross-platform, cloud based instant messaging software and application service. Telegram provides end-to-end encrypted video calling, file sharing, and several other features. Millman also stated he had previously used Cloud Platform A.

10. Millman acknowledged that he and Tara were both viewing child pornography. Millman also admitted that Tara had performed oral sex on a two-year-old male child (hereinafter "John Doe") and Millman had taken a video of it. Millman was confronted with a Telegram chat located by CFA Costello on Millman's cellular phone, where Millman stated he enjoyed rubbing a four-year-old minor female's (hereinafter "Jane Doe") vagina. Millman admitted he had rubbed Jane Doe's vagina. Millman stated he and Tara had sexually abused John Doe and Jane Doe, and they had recorded some of the sexual abuse.
11. Federal Bureau of Investigation (FBI) and SMCCTF TFO Root contacted Tara after law enforcement had secured the residence. TFO Root began the interview by letting Tara know she was not a target, but he needed to speak with her about Millman. Prior to the interview, law enforcement seized Tara's cellular phone, an Apple iPhone 11. Root obtained Tara's personal information and a timeline of residency. TFO Root was advised child pornography had been located on Tara's cellular phone by CFA Costello. At that time, TFO Root read Tara her *Miranda* rights and Tara agreed to waive those rights and continue talking with investigators.

12. Post-*Miranda*, Tara stated she and Millman used Telegram to communicate and share child pornography with each other. Tara admitted there were many images and videos of child pornography on her cellular phone. Tara explained she and Millman would view child pornography together. Tara stated in September 2020 or October 2020, Millman used her phone to record her performing oral sex on John Doe. Tara stated Millman had also performed oral sex on John Doe on the same occasion.
13. CFA Costello located an image depicting Tara performing oral sex on John Doe on both Tara and Millman's cellular phones.
14. This affiant confirmed that both Millman and Tara's Apple iPhones are manufactured outside the state of Missouri and would have had to cross state lines to enter. Furthermore, Telegram utilizes the Internet to function.


### CONCLUSION

15. Based on the above facts, this affiant believes there is probable cause in support of a criminal

complaint against Mark John Millman and Tara Sau Millman for violation of 18 U.S.C. § 2251(a),  
that is, sexual exploitation of a minor.

  
Jeremy Bluto  
Special Agent  
Homeland Security Investigations

Sworn to and subscribed to before me in my presence via telephone, or other reliable electronic means,  
on this 29th day of January 2021.

  
Honorable David P. Rush  
Chief United States Magistrate Judge  
Western District of Missouri