

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
ERIC JUNOD

Case: 2:15-mj-30382  
Judge: Unassigned,  
Filed: 08-18-2015 At 10:43 AM  
CMP: USA v ERIC JUNOD (MAW)

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 January 26, 2015 - August 17, 2015 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2252A(a)(2)	distribution and receipt of child pornography
18 U.S.C. 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  
Special Agent Brad Burnette, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: August 18, 2015  
City and state: Detroit, MI

  
Judge's signature  
Honorable Elizabeth A. Stafford, U.S. Magistrate Judge  
Printed name and title

## AFFIDAVIT

I, Brad E. Burnett, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 1991 and am currently assigned to the Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to high technology or cyber crime, child exploitation, and child pornography. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media including computer media.
2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Eric Junod** for violations of 18 U.S.C. § 2252A(a)(2) and (a)(5)(B), which prohibit the distribution, receipt, and possession of child pornography.

4. Because this criminal complaint is being submitted for the limited purpose of securing an arrest warrant I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that **Eric Junod** has violated 18 U.S.C. §§ 2252A(a)(2) and (a)(5)(B).

#### **BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

5. Through this investigation, **Eric Junod** has been linked to an online community of individuals who regularly send and receive child pornography via a website that operated on an anonymous online network.
6. The website was a child pornography bulletin board and website dedicated to the advertisement and distribution of child pornography and the discussion of matters pertinent to the sexual abuse of children, including the safety and security of individuals who seek to sexually exploit children online.
7. On January 26, 2015, a profile user **Viper45** registered with the

website. Subsequent investigation showed that user **Viper45** had been actively logged into the website for a total of 1 hour, 17 minutes between the dates of January 26, 2015 to March 3, 2015.

8. Law enforcement determined that Viper45 was visiting the child pornography website from IP address 70.90.136.49.
9. On March 3, 2015, the user **Viper45** with IP address 70.90.136.49 accessed the post entitled 'Village Girl' in the subdirectory 'Kinky Fetish>>Peeing>>Village Girl'. Among other things, this post contained an image of thumbnails from a video which depicts a prepubescent girl exposing her vagina to the camera and an adult male touching her pubic region with his finger. There was a hyperlink in the post and the author of the post, 'EVIL PRINCESS' stated, "Not sure if this goes here?..but the girl does piss twice in the video..so? I figured it goes here..ENJOY!!"
10. On March 3, 2015, the user **Viper45** accessed a post that contained a link to an image entitled '3yo Grandpa help to pee' that depicted thumbnails of a girl, approximate age of three years old, removing her underwear and being held up by an adult male with her legs spread wide to urinate, exposing her vagina to a camera.

11. On March 3, 2015, the user **Viper45** accessed a post that contained a link to an image that depicted a prepubescent girl, approximate age of three years old, who is naked, urinating in a toilet and then performing oral sex on an adult male.
12. Using publicly available websites, FBI Special Agents were able to determine that the above IP Address was operated by the Internet Service Provider ("ISP") Comcast.
13. In March 2015, an administrative subpoena/summons was served to Comcast requesting information related to the user who was assigned to the above IP address. According to the information received from Comcast, **Eric Junod** was receiving Internet service at XX1 Deer Valley Road, Holly, Michigan, with an installation date of July 22, 2011. Internet service was current as of March 16, 2015.
14. Additional investigation revealed that **Viper45** used the computer logon name "a-ejunod" which is similar to the first initial and last name of **Eric Junod**.
15. A search of the CLEAR database (a public records database that provides names, dates of birth, addresses, associates, telephone numbers, email addresses, etc.) was conducted for **Eric Junod**.

These public records indicated **Eric Junod's** current address was on Deer Valley Road, in Holly, Michigan.

16. A search of the Michigan Secretary of State records for **Eric Junod** revealed he has a current Michigan driver's license listing the XX1 Deer Valley Road as his address.
17. A review of Oakland County Land Records revealed that **Eric Junod** purchased the Deer Valley Road residence on or about October 2, 2003. Other documents related to the Subject Premises indicate the property is currently owned by **Eric Junod** and his spouse.
18. On or about July 27, 2015, during a physical surveillance of the Subject Premises, a device capable of detecting WiFi signals was activated near the front of the Subject Premises and no open wireless routers were determined to be in range of the detection device.
19. On August 14, 2015, a federal search warrant was authorized by a magistrate in the Eastern District of Michigan.
20. On August 17, 2015, federal agents executed the search warrant at XX1 Deer Valley Road, Holly, Michigan. **Eric Junod** was home at the time of the execution of the search warrant.
21. Agents seized a number of media items, including a laptop computer,

an iPhone, and an iPad. A forensic preview of the iPhone and iPad revealed over 600 images that meet the federal definition of child pornography. Eric Junod acknowledged that he stored his child pornography on his iPhone, iPad, and laptop computer.

22. After waving his *Miranda* rights, **Eric Junod** made the following admissions:
  - a. He admitted to downloading, trading (at least 100 times), and possessing child pornography;
  - b. He masturbates to child pornography, including child pornography involving bestiality, incest, and bondage;
23. **Eric Junod** initially denied that he had sexual contact with any children. He subsequently made the following admissions regarding his online behavior:
  - a. He started viewing child pornography in 2008;
  - b. He prefers girls age 10 – 13, but has viewed boys, and toddlers;
  - c. He has engaged in sexually explicit conversations with minor children online. He discussed traveling out of state to meet two underage girls, but claimed he never intended to do so;
  - d. He has sent pictures of his penis to underage girls and has

received sexually explicit images from underage girls;

- e. He has masturbated online for underage boys and girls via webcam. He has asked underage boys to masturbate for him, and they have. He has asked underage girls to send pictures of their breasts, and they have.

24. **Eric Junod** made the following admissions regarding his physical sexual contact with children:

- a. He admitted to inappropriately touching a little girl (MV-1), when she was as young as 12 months old;
- b. He admitted to being sexually attracted to MV-1 and has to fight feelings of arousal when she is scantily dressed or nude.



**CONCLUSION**

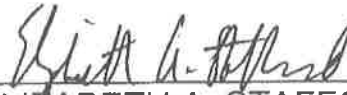
25. Based upon the foregoing, there is probable cause to believe that **Eric Junod** has knowingly distributed, received, and possessed child pornography in violation of 18 U.S.C. §§ 2252A(a)(2) and (a)(5)(B).

Accordingly, your Affiant respectfully requests that this Court issue an arrest warrant.



Brad E. Burnett  
Special Agent  
Federal Bureau of Investigation

Sworn to me this 18 day of August.



ELIZABETH A. STAFFORD,  
United States Magistrate Judge