STATE OF WISCONSIN CIRCUIT COURT PORTAGE COUNTY

STATE OF WISCONSIN,

Plaintiff

VS. CRIMINAL COMPLAINT

COURT FILE: 11CF39

DA FILE: 11FE41

DA: Thomas B. Eagon

I.D. #1008451

GRIFF A. FIRKUS (DOB 1-19-1974(M)) 1777 Evergreen Court Custer, WI 54443

Defendant

SPECIAL AGENT LOREEN GLAMAN, Wisconsin Department of Justice, Division of Criminal Investigations, being duly sworn on oath, says that:

POSSESSION OF CHILD PORNOGRAPHY Count 1: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "9YO vicky stripping and sucking (kiddy pedo illegal underage preteen).mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 2: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the

child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "7YO Jho - anal.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 3: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "9YO Jenny blows dad & dog.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 4: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "9YO abuse kids fucking raped latin (25,01 Min).mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 5: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "7YO strip and suck-good fullcum version-ptch.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25

years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 6: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "Tara 8yr - Tara gets molested by a clown.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 7: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "!!-NEW!!- kids - 10yrs.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 8: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "NEW!!! 2007 Jenny - 9YO digest1.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

<u>POSSESSION OF CHILD PORNOGRAPHY</u> Count 9: On or about the 1^{st} day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged

in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "Kylie Freeman (Vicky) - pedofilia Part4.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

POSSESSION OF CHILD PORNOGRAPHY Count 10: On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "Russian kids 8-10 years old fuck in the car at the mouth and in the ass", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

This is against the peace and dignity of the State of Wisconsin. Your complainant asks that the defendant be dealt with according to law.

The probable cause for complainant's allegation of said offense is:

Your complainant is a Special Agent with the Wisconsin Department of Justice, Division of Criminal Investigations. Your complainant's information is based on the records and files of that department. Your complainant has relied on these records and files in the past and found them to be both truthful and reliable. These records and files indicate the following information:

Special Agent Loreen Glaman, whom your complainant knows to be truthful and reliable based on past professional contacts, reports that on February 1, 2011 special agents with the Wisconsin DOJ/DCI, assisted by the Portage County Sheriff's Department and Stevens Point Police Department executed a search at the residence of Griff A. Firkus (dob 1-19-1974), the defendant herein, located at 1777 Evergreen Court, Custer in Portage County, Wisconsin. In Firkus' bedroom a desk top and a laptop computer were located which Firkus stated were used solely by him. DCI Analyst Jess Cattaneo conducted an on scene search of one of the computer's hard drive and located numerous files containing child pornography. Special Agent Glaman

reports she interviewed Firkus and Firkus stated that he used Frostwire to look for pornography. At the time of the search warrant execution, Firkus believed there were numerous video files containing child pornography on his computer, though was unable to give a count. Firkus stated he downloaded child pornography because it was "something to look at." Glaman indicates she examined the preview disk provided to her by Analyst Cattaneo and in viewing ten (10) files on the disk Glaman observed the following:

File 1:

This file begins with a girl with long dark hair standing near a bed. She is wearing a skirt and top. She takes off her clothes in "strip tease" fashion, until she is only wearing black thigh high stockings. She is small in stature, has no pubic hair and no breast development, consistent with a girl under 12 years old. She gets on her knees, and the adult male holding the camera comes towards her. The girl unbuttons his pants and removes his penis. She rubs his penis and puts it in her mouth. It is 1:39 seconds in length.

File Path:

Porn - (pthc) 9yo vicky stripping and sucking (kiddy pedo illegal underage preteen).mpg

Full Path: 11-46_Preview\11-46_Preview_1.2\C\PHTC\Porn - (pthc) 9yo

vicky stripping and sucking (kiddy pedo illegal

underage preteen).mpg

Description: File, Archive

File Created: 04/08/10 10:59:01PM Last Accessed: 04/15/10 08:15:22AM Last Written: 04/08/10 11:02:18PM

Hash Value: 81bb9181b3dca17fe8bc71f8279acc0f

File 2:

This file begins with a view of a girl with dark hair sleeping in bed with a black and white stripped quilt. The words "Jack H'oof Sick Daze" appear on the screen. The scene changes to a close-up of the girl's vagina, where a thermometer is being pushed into the girl's vagina. The girl has no pubic hair, consistent with a child under 12 years old.

The scene changes to a naked girl touching her vagina. An adult male's arm and penis are in the picture, and he is also touching her vagina as he strokes his penis. The girl has no pubic hair, no breast development and is small in stature, consistent with a girl under 12 years old. The man touches the girl's nipples, then puts his finger in the girl's mouth. The man gives the girl a sex toy shaped like a man's penis, and she rubs it against her vagina. The man takes the sex toys and puts it on the girl's vagina. The girl takes it again, and continues to rub it around her vagina, as the

male pulls apart her vaginal lips and touches her vagina. Their positions change, and the girls is lying on her back with her hips up in the air and her legs spread. The man is over her, and his penis is visible. The man touches his penis as the girl spreads her vaginal lips. The man ejaculates.

The scene changes and a girl lies down naked on a bed with a black, gray and white quilt and spreads her legs. She is small in stature, has no pubic hair and no breast development, consistent with a child under 12 years old. The camera zooms into the girl's vagina. The camera moves, and an adult male wearing a white t-shirt touches the girl's vagina, and the girl sucks on his penis. The man gets on the bed and kneels between her legs. He lifts her legs so her knees are near her head, and places his penis in the girl's vagina. The man continues to rape the girl using his penis, as he is touching her torso and vagina. The man puts his finger in the girl's vagina, and the girl pushes him away. The girl is next lying naked alone on the bed. The man kneels between her legs and rubs his penis and hands on her vagina. He pushes his penis into her vagina, and she cries.

The scene changes to another girl lying naked on a bed. She has no pubic hair and little to no breast development, consistent with a child under 12 years old. She rolls to the side and exposes her buttocks. She puts her finger in her anus, then rolls on to her hands and knees and lifts her buttocks in the air. An adult male enters the scene, and the girl pushes her buttocks into the air. The male pulls apart her butt cheeks, and rubs his penis on her anus, until he ejaculates. This is approximately 19 minutes into the file, and the same male and girl continue with similar acts until approximately 28:29, where the scene changes.

This scene begins with two naked girl's sitting on the edge of a bed, bent at the waist, as the camera pans into their buttocks. Both girls are small in stature, have no pubic hair and no breast development, consistent with children under 12 years old. girls get on their knees and pull apart their butt cheeks, exposing their anuses and vaginas. One the girls is given a long thin object (possibly a pen) and she inserts it into her vagina, moving it back and forth. The second girl also has a pen, and she is sitting near the edge of the bed pushing the pen in and out of vagina. She puts the pen in her mouth, then back into her vagina. A naked adult male stands at the edge of the bed, and the girl places her mouth on his penis. The male moves the girl so she is on the edge of the bed and he standing above her with his penis in her mouth. She puts the pen in her vagina. The other girl is again shown on her knees with her buttocks in the air while she pushes the pen in and out of her vagina. This scene ends at approximately 32:20.

The file is 49:17 in length, and continues through the remaining 18 minutes with similar acts with adult males and girls under the age of 12 as described above.

File Path:

pthc - 7yo Jho - anal.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\pthc - 7yo Jho -

anal.mpg

Description: File, Archive

File Created: 04/08/10 10:27:30PM Last Accessed: 04/15/10 08:16:05AM Last Written: 04/09/10 04:11:45AM

Hash Value: c61bb9d6935305ef32e52aed5f81f48a

File 3:

This file is 16:53 in length, and begins with a girl wearing only black thigh stockings lying on a bed with her legs spread and yellow rope tied around her thighs with the words "Jenny 9yo All Clips." She also has her hands tied together with the same yellow rope and is performing oral sex on an adult male, as the male digitally touches her vagina. The girl is small in stature and has no breast development and no pubic hair, consistent with a child under 12 years old.

The file appears to be several different scenes and does not seem to be in chronological order, as the girl is blindfolded and has her mouth on an adult male penis in one shot, and then is again shown without the blind fold. In some clips the yellow rope is visible, and it others it is not. At approximately 13:13, the girl is kneeling with her head under a dog, as the dog stands. The girl is sucking on the dog's penis. The scene again changes to the little girl lying naked on her back as an adult male touches her vagina and she sucks on his penis; a computer keyboard is visible in the background.

File Path:

#(Pthc) 9Yo Jenny Blows Dad & Dog.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\#(Pthc) 9Yo Jenny

Blows Dad & Dog.mpg

Description: File, Archive

File Created: 04/08/10 10:24:38PM Last Accessed: 04/15/10 08:19:56AM Last Written: 04/09/10 12:34:17AM

Hash Value: 5655b44624d798ce83977f13529ca0e4

File 4

This file begins with a naked girl kneeling on a bed with a plaid pink, blue and green quilt. The girl has no pubic hair and little

breast development, consistent with a child under 12 years old. She is wearing a mask. An adult male sits on the bed; he is wearing athletic shoes, a gray hat and a clown mask. pushes her down on the bed so she is lying with her legs facing the camera. He puts his fingers into her vagina. The girl moves so her head is nearer the camera and puts her mouth on his penis. The male pushes her head then rolls her so she is lying on top of him. He changes her position so she is kneeling on the edge of the bed, and he sits next to her. He puts his finger in her vagina. then has her kneel next to the bed, and puts her mouth on his erect penis. He puts her back on the bed, so she is lying on her back, and he inserts a pink sex toy into her vagina. The little girl can be heard crying, as the man says things such as "spread that pussy wide open" "you like being raped?" "You want to be raped again?" The little girl then puts her fingers in her vagina. The video ends at 12:56 as the little girls says "rape me."

File Path:

! New ! (Pthc) Tara 8Yr - Tara Gets Molested By A Clown.mpg Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\! New ! (Pthc)

Tara 8Yr - Tara Gets Molested By A Clown.mpg

Description: File, Archive

File Created: 10/03/10 11:50:23PM Last Accessed: 10/15/10 06:49:21PM Last Written: 10/14/10 08:15:43PM

Hash Value: ae2b6f85cd1368719ee2a835ef7ad368

File 5

This file is 3:09 in length, and consists of a boy and a girl on a bed. They begin clothed, but the majority of the file they are naked. Initially they wrestling on the bed, and then the boy lays on top of the girl. She is face down, and their buttocks are facing the camera. The boy puts his penis in the girl's vagina. Both children are small with no pubic hair, consistent with children under 12 years old.

File Path:

pthc-!!-NEW!!- Kids - 10yrs.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\pthc-!!-NEW!!-

Kids - 10yrs.mpg

Description: File, Archive

File Created: 10/03/10 11:47:16PM Last Accessed: 10/16/10 10:27:28AM Last Written: 10/14/10 06:32:15PM

Hash Value: bb3c8990bb91a326eb9be8a0f366689a

File 6

This file begins with two girls in swimming suits dancing, one has her hair loose, and the other has hers in a bun/ponytail on the top

of her head. Ad adult male sits on a chair and pulls one of the girls between his legs. She is facing the camera, and he rubs his hands on her chest and buttocks. Both girls take off their swimsuits, and the one with the loose hair sits on a bed. adult male lies on the bed next to the girl; he is now naked. other girl comes to the bed; she is also naked. She begins to suck on his penis. The girls switch, so the one with the loose hair is sucking on his penis. The man places her so she is lying next to him, and he rubs her torso and breast area. He places her hand on her vaginal area, but she moves it. The girl with the ponytail returns, and sits on the man's belly, and the man touches her breasts and buttocks. The girl with the long hair kneels on the bed, and the male touches and kisses her buttocks area. his penis on her feet. The girl with the ponytail then sucks his penis. The is video is 25:01 in length, and continues in the same fashion for the remaining time. Both girls have no pubic hair and no breast development, consistent with a child under 12 years old.

File Path:

Pedofilia 9Yo Abuse Kids Fucking Raped Latin (25,01 Min).mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\Pedofilia 9Yo

Abuse Kids Fucking Raped Latin(25,01 Min).mpg

Description: File, Archive

File Created: 10/03/10 11:10:35PM Last Accessed: 10/16/10 10:36:24AM Last Written: 10/04/10 01:28:22AM

Hash Value: 470c3e517554bffdca38007a058fc90d

File 7

This video begins with a girl sitting with her knees spread exposing her naked vagina. An adult male penis nears the vagina as the girls spread her vaginal lips, and it appears as though the man urinates on the girl. The girl has no pubic hair, consistent with a child under 12 years old.

The scene changed to a clothed girl playing with a cat. She is wearing orange pants and a white shirt. She removes her clothes and sits on a bed, as she puts her hands on her vagina and spreads her vaginal lips. She has no pubic hair, no breast development, and is small in stature, consistent with a child under 12 years old. At 3:18, the scene changes and the girl is again clothed in the orange pants and white shirt. She touches an adult male penis, then wipes it off suing her shirt. She puts her mouth on the penis.

The scene changes to a naked girl lying on her back with her knees pulled up exposing her vagina. An adult male rubs his penis on her until he ejaculates. He then puts his mouth on her vagina. The girl has no pubic hair and no breast development, consistent with a child under 12 years old.

File Path:

K@Ty 7Yo Strip And Suck-Good Fullcum Version-Pthc.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\K@Ty 7Yo Strip

And Suck-Good Fullcum Version-Pthc.mpg

Description: File, Archive

File Created: 10/03/10 11:37:33PM Last Accessed: 10/16/10 11:06:40AM Last Written: 10/04/10 04:09:32AM

Hash Value: 87145f707d04537236fc9fb31642b88a

File 8

This file begins with approximately 40 seconds of a compilation of what appears to be several of the scenes from File #3. The compilation is mostly of the little girl's face and of her with her mouth on an adult penis. The girl has no pubic hair and no breast development, consistent with a child under 12 years old.

At 40 seconds, the scene changes to the little girl lying on her back, naked. An adult male is touching her vagina with his fingers. She has her head turned towards him, as she moves her mouth on his erect penis. The girl touches her vagina. The scene changes to the same little girl on her knees with her mouth on an adult male's penis. The video continues for the next two minutes in a similar fashion as File #3, with several changes of scenes of the same girl naked with her mouth on an adult male's penis. This file is 7:18 in length.

File Path:

(Pthc) NEW!!! 2007 Jenny - 9yo digest1.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\(Pthc) NEW!!!

2007 Jenny - 9yo_digest1.mpg Description: File, Archive

File Created: 10/03/10 11:48:39PM Last Accessed: 10/16/10 11:11:32AM Last Written: 10/15/10 09:17:24PM

Hash Value: 5c3c406e7116df29c9d8d4072b46a2ea

File 9

This video begins with a girl wearing only white thigh high stockings and a black collar and dark green/black mask. She has bondage style ropes on her wrists and ankles, and is part of the identified "Vicky" series. An adult male wearing only a white t shirt places a pink sex toy into the girl's mouth. He rubs his penis on the girl's face and the girl sucks on his penis. The girl is then lying on a bed with her leg tied up and her arms tied above her head. The male digitally touches the girl's vagina as the

camera zooms in. The man rubs the girl's vagina and anus with the sex toy, he then places his mouth on her vagina, as he hold the sex toy near her anus and places it near her vagina. The then places his penis on her anus, and inserts it into her. He unties her hands, and she spreads her vagina. The girl has no pubic hair and no breast development, consistent with a child under 12 years old. This video is 15:30 in length.

File Path:

(Pthc) - Kylie Freeman (Vicky) - Pedofilia Part4.mpg

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\(Pthc) - Kylie

Freeman (Vicky) - Pedofilia Part4.mpg

Description: File, Archive

File Created: 10/14/10 09:21:36PM Last Accessed: 10/16/10 11:14:40AM Last Written: 10/14/10 09:21:42PM

Hash Value: b1b20b4e497286622edfb630e0a879d9

File 10

This file begins with a naked girl sitting on the floor with her legs spread and inserting a long thin object. The words "Jack h'Off On The Road Again" appear. The girl has no pubic hair and no breast development, consistent with a child under 12 years old.

The scene changes to a little girl sitting in the passenger seat of a vehicle, eating and playing with the radio. She is wearing a red, white, and blue striped top. She is then outside the vehicle with a silver coat. She gets back to the vehicle, and an adult male removes her pants and panties, and touches her vagina with his fingers, spreading her vaginal lips. The male pulls up her knees, and continues to fondle her. He turns her over onto her belly, so her buttocks are facing the camera, and he digitally penetrates her anus. He turns her over again, and touches her vagina. He then places his penis next to her vagina, and rubs it on her until ejaculation. He wipes the ejaculate with a green cloth, and the girl dresses.

The scene changes to a little girl sitting in a vehicle, undressing. Once undressed, she inserts a pen to her vagina. The girl has no pubic hair and no breast development, consistent with a child under 12 years old. She lies down and lifts her legs into the air. She continues to insert the pen into her vagina, and also puts her fingers into her anus. A male uses a lubricant on her as he pushes his fingers into and around her anus. This video is 49:28 in length, and continues in the same fashion.

File Path:

(Pthc Pedo) Russian Kids 8-10 Years Old Fuck In The Car At The Mouth And In The Ass (Pedo, Children, Girls, Malolo).avi

Full Path: 11-46 Preview\11-46 Preview 1.2\C\PHTC\(Pthc Pedo)

Russian Kids 8-10 Years Old Fuck In The Car At The Mouth

And In The Ass (Pedo, Children, Girls, Malolo).avi

Description: File, Archive

File Created: 10/04/10 06:41:38AM Last Accessed: 10/16/10 11:19:05AM Last Written: 10/04/10 06:42:13AM

Hash Value: 58820e3a03cb5612ed3f4328d7cf97ed

WISCONSIN DEPT. OF JUSTICE DIVISION OF CRIMINAL INVEST. Complainant

Subscribed and sworn to before me and approved for filing this 10th day of February, 2011.

THOMAS B. EAGON

District Attorney
Portage County

FirkusG.11FE41

STATE OF WISCONSIN CIRCUIT COURT PORTAGE COUNTY

STATE OF WISCONSIN,

Plaintiff

VS. INFORMATION

COURT FILE: 11CF39
DA FILE: 11FE41

GRIFF A. FIRKUS (DOB 1-19-1974(M)) 1777 Evergreen Court Custer, WI 54443 DA: THOMAS B. EAGON

I.D. #1008451

I, Thomas B. Eagon, District Attorney for Portage County, hereby inform the court as follows:

COUNT 1: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "9YO vicky stripping and sucking (kiddy pedo illegal underage preteen).mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 2: POSSESSION OF CHILD PORNOGRAPHY

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COUNT 3: POSSESSION OF CHILD PORNOGRAPHY

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COUNT 4: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "9YO abuse kids fucking raped latin (25,01 Min).mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 5: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "7YO strip and suck-good fullcum version-ptch.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 6: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "Tara 8yr - Tara gets molested by a clown.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D

Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 7: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "!!-NEW!!- kids - 10yrs.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 8: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "NEW!!! 2007 Jenny - 9YO digest1.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 9: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit conduct had not attained the age of 18 years, to wit: a recording described as "Kylie Freeman (Vicky) - pedofilia Part4.mpg", contrary to section 948.12(1m) of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

COUNT 10: POSSESSION OF CHILD PORNOGRAPHY

On or about the 1st day of February, 2011 in Portage County, Wisconsin, the defendant did knowingly possess a photograph, motion picture, video tape or other recording of a child engaged in sexually explicit conduct, knowing the character and contact of the sexually explicit conduct in the material and knowing or reasonably should have known that the child engaged in sexually explicit

conduct had not attained the age of 18 years, to wit: a recording described as "Russian kids 8-10 years old fuck in the car at the mouth and in the ass", contrary to section $948.12 \, (1m)$ of the Wisconsin Statutes, a Class D Felony punishable by a fine not to exceed \$100,000 or imprisonment not to exceed 25 years, or both.

This is against the peace and dignity of the State of Wisconsin.

Dated this 7th day of March, 2011.

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Thomas B. Eagon
District Attorney
Portage County