

**United States District Court**  
**Northern District of Florida**  
**PENSACOLA DIVISION**

UNITED STATES OF AMERICA

**WARRANT FOR ARREST**

v.  
**DANIEL CASTLEMAN**

CASE NUMBER: 3:08mj 23  
5:08-mj-0a7

TO: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest DANIEL CASTLEMAN

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment  Information  Complaint  Violation Notice  Probation Violation Petition

charging him or her with engaging in a child exploitation enterprise and conspiring to advertise, transport, ship and receive child pornography in violation of Title 18, United States Code, Section(s) 2252A(g) and 2252A(a)(1) and (2).

Elizabeth M. Timothy  
Elizabeth M. Timothy  
United States Magistrate Judge

2-29-08  
Date

@ Pensacola, FL  
Location

Bail Fixed at \$ none by h. l. addressed at initial appearance - E. Timothy  
Name of Judicial Officer

**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at : \_\_\_\_\_

Date Receive	Name and Title of Arresting	Signature of Arresting Officer
Date of Arrest		

AO (Rev. 5/85) Criminal Complaint

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

DANIEL CASTLEMAN

CASE NUMBER: 3:08m, 23

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about August 31, 2008, in Walton County, in the Northern District of Florida, and elsewhere, defendant(s) did, engage in a child exploitation enterprise and conspire to advertise, transport, ship and receive child pornography in violation of Title 18, United States Code, Section(s) 2252A(g) and 2252A(a)(1) and (2). I further state that I am a(n) Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:  Yes  No

*Robert Cochran*

Signature of Complainant  
Robert Cochran

Sworn to before me and subscribed in my presence,

February 29, 2008

at Pensacola, Florida.

*Elizabeth M. Timothy*  
Elizabeth M. Timothy  
U.S. Magistrate Judge

CERTIFIED A TRUE COPY  
WILLIAM M. McCOOL, Clerk

*Jessica M. Milstead*  
Deputy Clerk

FILED February 29, 2008  
(Date)

NORTHERN DISTRICT OF FLORIDA  
U.S. MAGISTRATE JUDGE

bounced around a distributed network of relays run by volunteers (computer nodes) located around the world. Generally speaking, a user's communication travels through three other participating user computers (nodes), before being sent to its final destination.

### BACKGROUND OF THE INVESTIGATION

7. During June 2006, representatives from the Queensland Police Service, Brisbane, Australia, informed members of the FBI's Innocent Images Unit of an international child pornography investigation regarding numerous subjects residing in various countries. Investigation to date indicates that a number of individuals (i.e. members) participating in this enterprise are located in the United States. The investigation involves a sophisticated and extremely organized group, hereafter referred to as "enterprise," of Internet Usenet users involved in the prolific trade/distribution of child pornography. The enterprise employs highly technical and advanced security measures to avoid law enforcement detection. Such techniques include, but are not limited to, the use of Pretty Good Encryption (PGP) software to encrypt messages posted to the enterprise's pre-designated newsgroup location where members communicate with each other, PGP encryption of binary files (which generally contain child pornographic material) uploaded to other newsgroup locations, and the swapping of file extensions which subsequently must be re-swapped in order to successfully

download a particular picture or movie file.

8. This investigation is predicated on information obtained from an individual who has been charged criminally in an unrelated child pornography investigation. This individual informed law enforcement that he/she was a member of this enterprise and identified a newsgroup titled "alt.anonymous.message" as the location at that time where members of the enterprise conducted/uploaded text [message] postings to communicate with each other. It is noted that since the time that the above referenced information was provided by the cooperating individual, the newsgroup location has changed several times. At this particular newsgroup location, members inform each other as to the newsgroup location (i.e. a different location) of where they have uploaded child pornography for members to go to download for their own personal collections. The child pornography binary files, either still pictures or video files, are never uploaded (i.e. distribution/transportation) to the newsgroup reserved for text [message] communications between members. Rather, the child pornography is uploaded to other innocuous newsgroup locations where members must go to retrieve/download the material. Specific directions are posted in the enterprise's newsgroup location, such as passwords, to ensure the successful retrieval/download of the image and/or video files.

9. The subject of the aforementioned investigation provided investigators with his/her PGP encryption keys which have allowed law enforcement to access, decrypt and monitor all activity/postings associated with the enterprise. Basically, law enforcement has infiltrated

the enterprise. To date, investigators have collected extremely valuable and incriminating evidence from various members of the enterprise. Since the initial monitoring of the newsgroups, approximately 403,442 images and 1,128 video files have been advertised, distributed and/or received by the enterprise (period of 08/31/2006 through 12/15/2007).

10. The enterprise currently consists of approximately 45 active members. There is a defined hierarchy or structure to the enterprise and all members must abide by strictly enforced written security measures and standard operating procedures in order to retain their membership status. To become a member of the enterprise, one must be invited in by an existing member, he/she must be known to trade child pornography material (i.e. demonstrated by being involved in other newsgroups involved in this activity), and must pass a timed written test to determine their knowledge of child pornographic material (e.g. knowledge of the names of various child pornography series; must be able to describe a particular series in question, etc.). The test also serves as a measure to assess whether the interested party could be an undercover law enforcement officer attempting to infiltrate the enterprise. Members of the enterprise are told never to provide their true identities to another member of the enterprise. They are never to communicate with one another using traditional email, chat, Yahoo!, ICQ, or telephone. For the security of the enterprise as a whole, their relationship with other members of the enterprise is strictly via the Internet. In this manner, if one of the members of the enterprise is ever arrested by law enforcement, that member cannot provide any identifying information to law enforcement on other members of the

enterprise.

11. The enterprise has developed outside contacts in the child pornography industry whereby they have made specific requests for the production of new child pornography material. In several instances, it appears the enterprise has been able to order new (unreleased) child pornography movies produced solely for the benefit of the enterprise (i.e. material which had not been distributed to the public in other child pornography forums). In addition, the enterprise has established an E-gold account, funded by the members, in order to purchase newly released child pornography material from various international producers.

12. As indicated above, the enterprise periodically moves from one newsgroup location to another where they conduct their primary text [chat] message communications with each other. This is done primarily for two reasons: 1) as a general principle to avoid law enforcement detection, and/or 2) because someone in the group made a mistake, violating the enterprise's written security procedures (e.g. failure to encrypt a message/posting, thus making it readily available for anyone to access and read), which would jeopardize the security of the group. Each time the enterprise moves from one newsgroup location to another, they also change all of their PGP encryption keys so there is no trail from one newsgroup location to the next location. Additionally, each time the enterprise moves, all of the members change their nicknames. For the most part, the selection of new nicknames is based on a particular theme that the leader of the group established for all of the members

to use/follow. For example, during one of the enterprise moves from one newsgroup location to another, the group adopted a theme related to cars (motor vehicles). As such, each of the members created a new nickname based on this theme (e.g. Thunderbird, Jaguar, Fender, Big Block, etc.). During a recent move from one newsgroup location to the current newsgroup location, all PGP encryption keys and nicknames changed; however, it was decided the theme would revert back to the previously used "Japanese" theme. In summary, the following chart depicts information or intelligence obtained during this investigation relating to newsgroup locations, themes, and nicknames associated with each of the subjects of this investigation:

Original Nickname	all.anonymous	all.anonymous.	at.lpl.mp3.	all.anonmail	japan.	all.os.	japan.
	.email	message	encrypted	net.messages	security.pgp	security	security.pgp
	Car Theme	Cooking	Music	(no theme)	Japanese	(no theme)	Japanese
	Time frame	Theme	Theme	(no theme)	Theme	(no theme)	Theme
	unknown	Unknown - 12/2/04 -	12/2/04 -	01/26/07.	03/17/07 -	08/08/07.	01/07/08 -
	unknown	12/2/04	01/18/07	03/16/07	08/07/07	01/08/08	present
Yardbird	Thunderbird	Gyro	Mask	Asternik	Arigato	White Hat	Kishi Kazuo
Helen	Jaguar	Monge Toubi	Pan	Spock	Honda	Thor	Wong
Nimo	64GTO	Chardonnay	Myers	Montica	akon	Bugs	Dug Chow
Pika	BMW 330ci	Steakhouse	Steppenwolf	Sasame	Shinkansen	Autobated.	Bandan-Dancer
Screwtape	Scooter	Maginix	John Brewer	Maggie Ite Mog	Shuh	Headstrong	Kai Lung
Sally	Herbie	The Naked Chef	PunkGrr	Padrone	Hanoi Jane	Kiva	Chairman Mao
Argus	Armstrong	Eggs Benedict	Seller	Achilles	DimSim	SnakeCham	Origami
Flar	Siddley					or	
Mr E	Firebird						
Mr E	Stealth	Cordon Bleu				PcCtpts	Ramen
Crazy Horse	Big Block	Short Order	Morgan Ruth	Brett Reynolds	Bayshusa	Mister Mix	Sumo Hibachi
Proteus		rwik	Oscar	DXD	Chi		
Sue	MGB	Della	Dazed	Robin	Kerjogo	Sianbarblast	Ming
Larch	Normed	Julia Child	Nic	Rook	yen	pipol	Et
Toddler		Tryma	Hexagon	Perpendicular		Pampira	Messenger
Lizzard	Henry J	Waffles	Garfield	Pocch	Wakisagehi	Six Pax	Dong Hu
Ohuna	ElDorado	Tiramisu	Hauptman	Hummingbird	Okinawasan	Ganba Giant	Selva
Fletcher							
Rabbit	Spyder	Fondue	Strauss				
Earch	Escort	La Zucca	Makaymuk	Oris	Shiral	Room	
Nym	Thesis	Vinagrette					
Chingachpook	Yuge	Sage	Red Baron	Cheesehead	Jumil		
Electron	Garage	Grilled Lobster	Mr Swing	Broadway	Fuji	C@T.biz	Mandarin
Joi	Bentley	Truffles	Roadie	rock-n-rya	Kirishime	Omega	
Tex (Mavrick)	NissanZ	Bill Granger	Economy	white widow	Nikkai	Insect	Chairman

Beep	Probe	Eplouran	Husky	Nemie	Lemon Gumball	BlueApple	Zong Yin Kaga
MoS System	DeLorean	Burgemeister	Master P				
Pickman	Model T	The Galloping Gourmet	Ozzy	The Phantom	Chop Surey	Magilla	Rickshaw
Dream Catcher	Diamond	Dill Weed	Dry Cell	DeBney	Dao Chan		
Papene Eggplant		Pudding	Fuck	slim	Okiko	Abe	Hy
Mud/Dib	Vega	Crème Brûlée Chef Jacques	Hard Rock	Blaise	Dien	Analyskar	Yemoto
Pato	Boss442	Pepin	Easy Rider	Clark	Zorbak	Ablon64	Sakki
The Clerk	Morris	CurryWurst	Tangerine Dream	Interceptor	Toyota	mb2 thebunker	Sallythe4th
Nawiner Burnhead	Kamatsu	Sashimi	Scott	Tekgnlar R.T.	shiko Mutashi	gforce	
xxxx							
Gina ow5	Toyota	Umami	Mo	adi	Yamada Odo	Ufo	ail
Archiver		Bon appetit					
Twenty	Mini Minor				Seyun	K9	
Soft	Cuda	Hot Pepper Watermelon	Loveick	Trip	Wl	Like that	Cass
Blackhawk42		Wine					
Yellowhead	CarWasher	Vegetarian	Drum	Triamp	Komodo	DaBit	Suniko Low Fal
RoadKill	Hudson Hornet	Grilled Cheese	Anonymous	anonymous		Anonymous	
Wonka	Boobie						
Box of Rocks	Salfane	Artery-clogger	Carlman	Susik	Haneko	Volth	Monorial Cat
Mystical Spider	Vanquish8	Fenny Farmer	Rasjman	Brookhouse	Sakura	Gunter	Puan
Shella Sparky	Fender	Tournados	Sibelius	House	Kansie	Eastern	Sapooro
Unforgiven							
SweetLeaf							
Vernon							
Peuvor							
Methusalem		Choccholls	Grumpy	Van Dutch	Funmetashi	Reboot	Pegasso
Wraith		Patches	Metalhead	sender	Fauen	Jolly Roger	Chinku
Hammer		RacheRay@ FHM.com	RaginCajun				
Caratucue			Malechal	Horus Mr. Vitamin	Mikado	Jeepers	Anvil
PeTuS				B12	Bushido	RunningMan	
silvershadow					Kansl	twenty	Ashima
Zorro					Mata Hari		
buc						Alpha Tek Perce P	Yoshiumi
Eurydice						Cassidy	The Hermit

**SPECIFIC SUBJECT LOCATION INFORMATION**

13. Daniel Castleman has been identified as a subject in this investigation. As further



described below, he is directly associated with the following nicknames used by him to communicate with other members of the child exploitation enterprise: "Chingachgook," a.k.a. "Yugo," a.k.a. "Sage," a.k.a. "Red Benson," a.k.a. "Cheesehead," a.k.a. "Jummi."

14. On or about February 28, 2006, an individual utilizing the nickname "Yugo" (Daniel Castleman) posted a message with the subject line "Mail to those who like automobiles," in the newsgroup *alt.anonymous.email*, and encrypted with the PGP keys utilized by members of the child exploitation enterprise. In the message, "Yugo" stated in part "First, I would like to thank all of you that have posted. You all have done a wonderful job. I recently suffered an injury to my person, no I'm not going to say whether it's medical or physical injury. I don't want to say for security reasons. Anyway, I have been out of commission for a couple/several months now. I have barely been able to keep up do to my condition. I don't tell all of you this for sympathy, but as a way to apologize for all of my requests. I'm not fully recovered, in fact, with the probability of more surgery and other medical care. So, please forgive me if I request more reposts in the future. The body may wither, but the pedo drive never dies."

15. On or about February 28, 2006, "Yugo" (Daniel Castleman) posted a message with the subject line "Re: Purple Neons," in the newsgroup *alt.anonymous.email*, and encrypted with the PGP keys utilized by members of the child exploitation enterprise. In the message, "Yugo" responded to a prior posting from another member of the enterprise regarding a video which was uploaded for the group referred to as "YoungVideoModels

Daphne-3." "Yugo" stated "Thanks for the Daphne 3 vid. Beautiful girl. The only thing that would make this vid better; is having my face between her legs, etc., etc. aaaahhhhhh!!!! Take care and stay safe, Chingachgook aka Yugo." This posting reflects "Yugo's" receipt of child exploitation material.

16. On or about September 5, 2006, an individual utilizing the nickname "Sage" (Daniel Castleman) posted a message with the subject line "Re: Mushroom Puffs," in the newsgroup *alt.anonymous.message*, and encrypted with the PGP keys utilized by members of the child exploitation enterprise. In the message, "Sage" responded to a prior posting from another member of the enterprise regarding material which was uploaded for the group. "Sage" stated "Nice, very nice. I'm glad I covered my keyboard with plastic wrap before viewing the pics and vids. I think I have a new daughter in my fantasies. Thanks again. Walk in peace, Sage." This posting reflects "Sage's" receipt of child exploitation material.

17. On or about March 10, 2007, an individual utilizing the nickname "Cheesehead" (Daniel Castleman) posted a message with the subject line "Re: Gulf of Tonkin Incident," in the newsgroup *alt.anonmailnet.messages*, and encrypted with the PGP keys utilized by members of the child exploitation enterprise. In the message, "Cheesehead" provided information regarding the download, decryption, and re-assembly of files located in the newsgroups *alt.binaries.test.yenc* (a.b.t.yenc).

18. On or about March 10, 2007, an individual utilizing the nickname