

UNITED STATES DISTRICT COURT
for the
Central District of Illinois

United States of America)
v.)
) Case No. 20-MJ- 6471
)
)
)
)
)
Douglas Michael Speer)
Defendant(s)

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 on or about 11/12/20-11/13/20 in the county of Rock Island in the
Central District of Illinois, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2422(b)	using facilities of interstate commerce, that is a mobile phone, connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity under such circumstances as would constitute a criminal act in violation of 18 United States Code, Section 2422(b)

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

s/Kurt Bendoraitis


Complainant's signature

SA Kurt Bendoraitis

Printed name and title

Sworn to me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1


s/Jonathan Hawley


Jonathan E. Hawley, U.S. Magistrate Judge

Date: 11/16/2020

City and state: Peoria, Illinois

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) CASE NUMBER 20-mj-6471
)
)
DOUGLAS MICHAEL SPEER,)
)
)
Defendant.)

CRIMINAL COMPLAINT

I, Kurt Bendoraitis, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count 1
(Attempted Enticement of a Minor)

From on or about November 12, 2020 through November 13, 2020, the defendant,

DOUGLAS MICHAEL SPEER,

in Rock Island County, Illinois, within the Central District of Illinois, and elsewhere, using facilities of interstate commerce, that is a mobile phone, connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity under such circumstances as would constitute a criminal act in violation of 18 United States Code, Section 2422(b).

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation and have been since May 14, 2017. As part of my duties, I investigate violations of federal law, including the online exploitation of children, particularly in relation of violations of Title 18, United States Code, Sections 1591, 2251, 2252A, and 2422 which criminalize, among other things, the production, advertisement, possession, receipt, transportation of child pornography, individuals attempting to persuade, induce, and entice minors to engage in sexual activity, and underage prostitution. I have gained experience in the conduct of such investigations through training in classes and work related to conducting these types of investigations. Specifically, I have received training in the Online Sexual Exploitation of Children. I have been involved in multiple search warrants, arrests, and have conducted online chatting investigations in an undercover capacity. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal courts.

2. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of securing an arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Douglas Michael Speer committed violations of Title 18, United States Code, Sections 2422(b).

STATUTORY AND LEGAL AUTHORITY

3. This investigation concerns violations of Title 18, United States Code, Section 2422(b), relating to the enticement or the attempted enticement of minors to engage in prostitution or any sexual activity for which any person can be charged. Based upon my training and experience, as well as conversations with other experienced law enforcement officers and experienced federal prosecutors, I know the following:

- a. 18 U.S.C. 2422(b) prohibits using any facility or means of interstate commerce to knowingly persuade, induce, entice or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged, or attempt to do so.
- b. The internet is a facility of interstate commerce.

Definition of Terms

4. The following terms used in this affidavit have the indicated meaning in this affidavit:

- a. The term "minor" is defined at 18 U.S.C § 2256(1) as any person under the age of eighteen years.
- b. The term "sexually explicit conduct" is defined at 18 U.S.C. § 2256(2)(A) as actual or simulated – (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or anal-oral, whether between person of the same or opposite sex; (ii) bestiality, (iii) masturbation; (iv) sadistic or masochistic

abuse; or (v) lascivious exhibition of the genitals or pubic area of any person.

c. The term "computer" is defined as set forth in 18 U.S.C. § 1030(e)(1).

Investigation

5. On November 12, 2020, an FBI Online Covert Employee (OCE) was conducting an undercover investigation on the website skipthegames.com. Due to Affiant's training and experience and from other law enforcement officers I have conferred with, I know skipthegames.com is an escort website mainly used for the advertisement of prostitution. OCE posted an advertisement titled "Snow Bunny Special" with text "Sexy petite snow bunny ready for fun. Ask for my little sister for a two gurl special" and then prices were provided for length of time wanted by customers. A telephone number was provided on the advertisement in order to contact OCE. The advertisement had two pictures from the neck down of a female.

6. A user later identified as Douglas Michael Speer (SUBJECT), utilizing telephone number 515-207-2738, directly text messaged OCE's telephone number and the following are excerpts from the conversation between SUBJECT and OCE:

SUBJECT: Hey how's your night going? I'm interested in your listing and the 2 person special 😊 Are you legit?

OCE: Yea def legit

SUBJECT: Perfect! You should send a pic of you and your sis. Id love to meet up

OCE: : [Picture of a female, an FBI Confidential Human Source (CHS1) with animated animal ears and nose]

OCE: [Picture of a young female, an FBI CHS2 posing with her hands up to her face like a telephone. A filter was used to make CHS2 in the picture appear younger.]

SUBJECT: She looks really young. How old are you guys

SUBJECT: I think you're hot

OCE: Shes 11yo but you can see very sexy

SUBJECT: Wtf

SUBJECT: That isn't happening

SUBJECT: Wait, how old are you?

SUBJECT: ?

OCE: Do you really need to know

SUBJECT: Kind of important id think

OCE: Well I'm a little younger

SUBJECT: Like 16?

OCE: 15

SUBJECT: Guuuuurrll what are you doing? What's a 15 yr old need to be on skip for?

OCE: Need money just like everyone else

SUBJECT: But you're only 15! Not to mention illegal even if y'all are cute

OCE: Well I'm not telling anyone

SUBJECT: I have no way of knowing that hun

OCE: Well ok ttyl

SUBJECT: :/

OCE: What

SUBJECT: It's just a shame bc you're very pretty

SUBJECT: I'm looking to have fun, not get locked up [frowning Emoji face]

OCE: Haha well I'm just looking for fun

SUBJECT: But money too? How in the world are you roping your sister into it too?

How is she cool with it?

OCE: She loves having nice things too

SUBJECT: Even if it means banging a dude?

OCE: Yea I mean its not like she hasn't done it

SUBJECT: Hmm

SUBJECT: I can't believe I'm even tempted

OCE: [Two laughing Emojis]

SUBJECT: Whaaaaat

SUBJECT: I told you I wanted to have fun [Eyes looking up Emoji]

OCE: Haha well what you want

SUBJECT: Where can you host?

OCE: Its 275 for both of us

SUBJECT: Can you take a picture together for me

OCE: I can later. My lil sis isn't around rn

SUBJECT: You should, thank you! Where would I be able to meet you

SUBJECT: [A photo of SUBJECT lifting his shirt exposing his chest.]

OCE: Sexy!!!!

SUBJECT: Hmm Where is near your house? Where would we go?

OCE: By saukie golf corse

SUBJECT: I think I known where that is.

SUBJECT: Would we meet by the house and then go inside? Idk what your plan is
[laughing emoji]

SUBJECT: You're about 25 min from me

OCE: Yea if you wanna do it here

SUBJECT: I don't have another place to do it

OCE: That's works for me but you gotta leave after your done unless your paying more

SUBJECT: After I'm done? You mean after an hour?

OCE: Yea

OCE: I mean after your hour

SUBJECT: What would it be for longer

OCE: You want is both for longet

SUBJECT: Possibly

OCE: 50 for ak extra half hour

SUBJECT: Hmm What are the rules here

OCE: No pain and my sis hasn't done anal

SUBJECT: I've never done anal either so it's fine. Id be up for trying but not a deal breaker

SUBJECT: If your sister isn't okay with seeing me that's okay btw

OCE: Well shes cool as long as your paying

SUBJECT: Do you both enjoy it?

OCE: I do and my sis loves when she gets eaten out

SUBJECT: Hmm She could sit on my face while you're on me

OCE: We could def do that

SUBJECT: Do you guys kiss or anything? Or are you pretty separate?

OCE: We can if you want

OCE: Not my fav but we do it

SUBJECT: I think it would be hot but if you guys don't like it then you don't have to

SUBJECT: I'd rather you both enjoy yourselves

[...]

SUBJECT: I'm definitely not, I'm very respectful. Can I ask you a dumb question?

OCE: Yea

SUBJECT: Are you affiliated with any law enforcement or are part of a sting operation?

Thought I might as well ask

OCE: No way that would be like evil lol

SUBJECT: I mean yeah it would but it happens!

OCE: Yea I guess so too many bitches lol

SUBJECT: I meant it more because you guys are younger ya know? Have you done this a lot?

OCE: Yea we done it a few times

[...]

SUBJECT: What time tomorrow were you thinking?

OCE: Well our moms leaving in the afternoon tomorrow

SUBJECT: For how long?

OCE: Till Sunday

OCE: Shes going to her bfs

SUBJECT: Oh dang I though you meant she had an event or something to go to. I guess that makes things a little easier since we don't have to rush.

OCE: Definitely

SUBJECT: I can head your way after work

OCE: Awesome!

SUBJECT: Is there anything else I should know?

OCE: I dont think so

OCE: Just bring money lol

SUBJECT: Cashapp is fine?

OCE: Yea that will work. Cash is better thou

SUBJECT: I don't like having that much on me. I can use venmo or PayPal if that's better for you

OCE: You gonna bring the condoms

SUBJECT: Do you have any?

OCE: I got 2 here but figured you wanna hour lol

SUBJECT: Id love longer but we'd all be exhausted [laughing emoji]

SUBJECT: I'll bring some just in case

OCE: Sounds good

SUBJECT: What are you good at or what do you enjoy doing the most?

OCE: Idk lol. Never had any complaints with bjs and I like prolyl doggy the best

SUBJECT: Is there anything you want to try?

SUBJECT: Same question for your sis

SUBJECT: Can you take that picture before I head to bed? 😊

SUBJECT: If anything changes tomorrow lmk

The conversation continued on November 13, 2020

SUBJECT: Today still work?

OCE: Yea it does

OCE: Still work for you

SUBJECT: I hope so, I'm trying to hurry up and get done with work. Feel free to send me stuff while I'm doing that

OCE: Cool I'll let you know when our mom leaves

OCE: Rn I'm pretending to pay attention to online learning lol

SUBJECT: Zoom call classes?

SUBJECT: [Photo of SUBJECT wearing a mask] I'm busy trying to get deliveries done

OCE: Cool like delivery what and yea some are zoom and others I just have to log in to show I'm watching a class

SUBJECT: Snack food! I've got 8 accounts today

OCE: Awesome you gonna bring some lol

SUBJECT: I have some cookies, and some chips

SUBJECT: What do you like?

OCE: Chocolate chip cookies are my fav my sister likes doritos

SUBJECT: Hmmmm I only have peanut butter cookies that were damaged

OCE: I still like peanut butter cookies just chocolate chip is my fav

SUBJECT: If I get any I will bring them 😊

OCE: Awesum!! I hard my mom talking to her bf she said she was gonna be leaving around 5 or 6

SUBJECT: That late? Oh nooooo

SUBJECT: I'll be busy by 5

OCE: Really!?!? Well hopefully she leaves sooner

OCE: I'll let you know like as soon as shes gone

SUBJECT: Fingers crossed

SUBJECT: Yeah please let me know [frowning emoji face]

SUBJECT: Maybe you can convince her to leave haha

[...]

OCE: Moms gonna leave in about 30 mins

SUBJECT: Lemme know when she leaves. I'm about to leave work

SUBJECT: It will take me 25min to get there if I can

OCE: I'll let you know

SUBJECT: I don't have a lot of time [Four frowning emoji face]

OCE: Shes leaving in 10 mins

SUBJECT: Okay! Where can I meet you

OCE: Shes walkin gout now!!!!

OCE: Once she leaves you could just like come ovef

OCE: You have the \$\$\$

SUBJECT: I do

OCE: Can I see it? Been like screwed before

SUBJECT: Man idk how much time I'm gonna have I said I was gonna do cashapp?

OCE: Gotcha. Ok. Well shes gone

SUBJECT: Would you rather I come over a different time so I can spend more time?

OCE: That's like up to

OCE: Whatever makes us more \$\$\$ [Emoji sticking green dollar sign tongue out]

SUBJECT: We can meet Sunday morning and I'll have a lot of time

OCE: My mom comes home Sunday

SUBJECT: Not that early tho

SUBJECT: ?

OCE: A qv with both of us will be 125

SUBJECT: Wanna meet at 4am Sunday? Should give us plenty of time

OCE: I'm not getting up that early

SUBJECT: Fuuuuuuuuck How early can you do

SUBJECT: I'll even do cash instead

OCE: Can you like tomorrow night or later tonight

SUBJECT: I'm busy tonight and I'm out of town tomorrow

OCE: Oh well

SUBJECT: Okay well i can do half hour right now

OCE: Ok

SUBJECT: I'll be in your area just before 5

OCE: 125

SUBJECT: Lmk

OCE: For the both of us

OCE: Lemme known when you want our address

SUBJECT: You can send it now

OCE: [target location]

SUBJECT: Can you send a pic

SUBJECT: I'm omw

OCE: [Picture of CHS1 wearing grey Nike sweatshirt]

SUBJECT: I should. Pic of you and your sis?

OCE: [Picture of CHS2 holding ok sign with hand. A filter was used to have CHS2 appear to be younger]

SUBJECT: Both of you in the same picture? I'll give extra

OCE: Were not here so you could like jack off

SUBJECT: What?

OCE: I'm worried you might like just take care of yourself

SUBJECT: I'm not tryna do that

SUBJECT: Not fun

SUBJECT: Hello

OCE: Waiting on you baby lol

SUBJECT: [Picture of someone holding cash] You didn't send the pic [frown emoji]

OCE: What pic were waiting on you

SUBJECT: You two together

OCE: Well yea

SUBJECT: I am like down the street

OCE: Cool

SUBJECT: Meet me outside?

OCE: Like want me to come outside and wave

SUBJECT: Sure

OCE: Are like outside

SUBJECT: Down the street gimme a min

OCE: Lmk

SUBJECT: I'm ohtside

OCE: Ok my sis is waving

OCE: We dont see anyone

7. On November 13, 2020, at approximately 5:12PM, Special Agents and Task Force Officers observed a male walk up to the target location and knock on the door. Special Agents and Task Force Officers then opened the door, identified themselves, and arrested Subject. Subject was identified as Douglas Michael Speer. Found on Speer's person were two peanut butter cookie packages, a condom, 208

dollars in cash, and a mobile phone black in color. Speer's physical appearance was consistent with the photographs sent to OCE.

8. Once in custody, Speer was interviewed and given his Miranda Warnings. Speer agreed to speak to Agents and the following is a summary of the interview: Speer stated he was there to meet with someone he thought was 16 and then later told Agents the person said she was 15 years old. He stated he was using a dating application to communicate with the 15 year old. He left from work in his personal vehicle from Davenport, Iowa and drove to the target location in Rock Island, Illinois. He planned to meet with a 15 year old to pay for sexual activity with her and her 11 year old sister.

Conclusion

9. Based on the foregoing, I submit that there is probable cause to believe that between November 12, 2020 and November 13, 2020, Douglas Michael Speer, using a facility and means of interstate commerce, his cellular telephone to access the Internet, knowingly attempted to persuade, induce, and entice an individual who had not attained the age of 18 years, to engage in a sexual activity for which a person could be charged in violation of 18 U.S.C. 2422(b).

FURTHER AFFIANT SAYETH NOT.

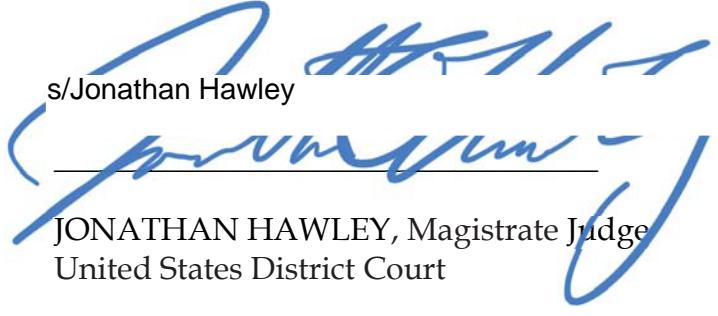
s/Kurt Bendoraitis



Kurt Bendoraitis, FBI Special Agent

Sworn to me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1 and 4(d) on this 16th day of November 2020.

s/Jonathan Hawley


JONATHAN HAWLEY, Magistrate Judge
United States District Court