

SEALED

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

FILED

APR 3 2015

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA, ILLINOIS

United States of America
v.

Case No.

15-MJ - 7014

NICOLE EASON and CALVIN EASON

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 March 2007 in the county of Vermilion in the
Central District of Illinois, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1201(a)(1)
18 U.S.C. § 2423(a)

Kidnapping
Transportation of a Minor

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

s/Justin Tennyson

Complainant's signature

Justin Tennyson, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

s/David G. Bernthal

Judge's signature

Date: 04/03/2015

City and state: Urbana, Illinois

David G. Bernthal, United States Magistrate Judge

Printed name and title

AFFIDAVIT

Justin Tennyson, being duly sworn, states:

A. Introduction and Agent Background

1. I am a Special Agent with the FBI and have been for approximately four months. During my employment with the FBI, I have participated in investigations involving violent crimes including crimes against children/child pornography. I am currently assigned to the Springfield Division Champaign Resident Agency, which is responsible for investigating Federal violations in 13 counties in the Central District of Illinois, including Vermilion County. As part of my daily duties as an FBI Special Agent, I investigate criminal violations related to Kidnapping, Sexual Exploitation of Minors and Transportation of Minors with the Intent to engage in Sexual Activity.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Nicole Eason and Calvin Eason have violated 18 U.S.C. § 1201 (Kidnapping) and 18 U.S.C. § 2423(a) (Transportation of Minors with the Intent to Engage in Sexual Activity).

Facts Supporting Probable Cause

4. In early February 2015 Jane Doe 1¹ disclosed to her parent, Custodian Parent 1² that she was sexually abused by Calvin and Nicole Eason, while in their custody and control for several weeks during March 2007, in Danville, Illinois, in Vermilion County in the Central District of Illinois. Custodial Parent 1 contacted the FBI in her local jurisdiction and arranged for a child forensic interview of Jane Doe 1.

5. On February 20, 2015, Jane Doe 1 participated in a forensic interview at the Child Advocacy center in her local jurisdiction. She disclosed that while living with the Easons at their home on the 1400 block of Chandler Street, in Danville, Illinois, the Easons would lay in bed naked and try to convince Jane Doe 1 to remove her clothing and lay between the two of them. Jane Doe 1 said that she was forced to watch pornography on numerous occasions. Jane Doe 1 disclosed that Nicole Eason performed oral sex on her and would slap and hit her if cried or resisted. Calvin Eason often bathed Jane Doe 1 and would penetrate her vagina with his fingers when Nicole Eason was not present. Jane Doe 1 described occasions when Calvin Eason walked around the residence completely nude and would try to disrobe Jane Doe 1 and force her to touch his penis with her hand. Again, whenever she cried or resisted, Calvin Eason would slap or hit her and command her to stop. Jane Doe 1 remembered spending her 8th birthday while living with the Easons.

¹ Jane Doe 1 is a minor female born in March 1999. As a child victim, the victim is entitled to the privacy protections set forth in Title 18, United States Code, Section 3509. As a child victim, the victim is presumed to be a competent witness under federal law, 18 United States Code, Section 3509(c).

² To protect the identity of the minors involved in this case, the adults are not referred to by name.

6. On March 13, 2015, Special Agent Andrew Huckstadt interviewed Custodial Parent 1. She explained that in 2006 and 2007 she moderated an adoption discussion board through a Yahoo! Group³ that was intended to be a support and resource for families struggling with their adoptive children and families looking to adopt children. Custodial Parent 1 remembers that Nicole Eason, who went by the screen name "Big Momma," posted a picture of herself, her husband, Calvin, and a little boy that she claimed to have adopted through "disruption," believed to be John Doe 1⁴. Custodial Parent 1 explained that "disruption" referred to the process by which a child, who was adopted by another family first, is placed in another home because the family cannot care for the child for whatever reason. Nicole Eason told Custodial Parent 1 that she had another daughter who was living with her mother in New York City to attend an advanced school for singing and dancing. Custodial Parent 1 said that Nicole Eason seemed very nice and actively participated in the group.

7. Nicole Eason told Custodial Parent 1 that she and her husband, Calvin, were looking to adopt again. She said that they had an attorney and obtained a "home

³ "Yahoo! Groups" is one of the world's largest collections of online discussion boards. The term Groups refers to Internet communication which is a hybrid between an electronic mailing list and a threaded Internet forum, in other words, Group messages can be read and posted by e-mail or on the Group's webpage like a web forum. In addition, members can choose whether to receive individual, daily digest or Special Delivery e-mails, or simply read Group posts on the Group's Web site. Groups can be created with public or member-only access. Some Groups are simply announcement bulletin boards, to which only the Group moderators can post, while others are discussion forums.

⁴ John Doe 1, was a 10-year-old minor child while in the custody of the Easons. He resided with the Easons for several months beginning in July 2006. The Easons drove to the state of Wisconsin and obtained John Doe 1 from his adoptive mother, who they met through a Yahoo! Group.

study⁵ waiver” but struggled to find a child since she was white and her husband was African American. Nicole Eason complained that many people wouldn’t give them the “time of day” and that “prejudice still existed.” Nicole Eason also claimed to have been a foster parent and provided respite care⁶ before. Nicole Eason claimed to have experience working with children with various behavior disorders. Custodial Parent 1 introduced Nicole Eason to the group.

8. At about this time, Adoptive Parents 1, Jane Doe 1’s adoptive parents, were seeking to “re-home” Jane Doe 1. On March 26, 2015, Special Agent Huckstadt interviewed Adoptive Parents 1, who explained that they obtained custody of Jane Doe 1 in 2002, when she was 3 years old. They were her seventh placement. Jane Doe 1 was non-verbal and struggled with numerous behavioral issues. Nevertheless, Adoptive Parents 1 adopted Jane Doe 1 in 2004, but her behaviors continued to escalate.

9. In 2006, male Adoptive Parent 1 was diagnosed with a serious medical condition as was their adopted son. Female Adoptive Parent 1 explained that these diagnoses, coupled with Jane Doe 1’s behavioral issues, were too much for them to handle; they began searching for a new home for Jane Doe 1. Female Adoptive Parent 1 explained that there were no viable options in their home state. In early 2007, Female Adoptive Parent 1 connected with Custodial Parent 1 via a Yahoo! Group. Female

⁵ A home study is a screening of the home and life of prospective adoptive parents prior to allowing an adoption to take place. In most states a home study is required by an adoption agency. Based on my research and investigation, a “home study waiver” does not exist.

⁶ Respite care is short-term accommodation in a facility outside the home in which a loved one may be placed. Respite programs provide planned short-term and time-limited breaks for families of children with a developmental delay in order to support and maintain the primary care giving relationship.

Adoptive Parent 1 was looking for resources to help her cope with Jane Doe 1's behavioral issues.

10. Custodial Parent 1 introduced Adoptive Parents 1 to the Easons. According to Female Adoptive Parent 1, Custodial Parent 1 believed that the Easons would be a good fit for Jane Doe 1. Adoptive Parents 1 began chatting with the Easons via video chat through Yahoo!, e-mail and by telephone. The Easons lived in Danville, Illinois and Adoptive Parents 1 lived in the state of California at that time.

11. Female Adoptive Parent 1 explained that the Easons seemed like nice people. Female Adoptive Parent 1 read from an email that she saved from Nicole Eason where she described their stable family life and parenting philosophy. In that communication, Nicole Eason described her willingness and ability to provide mental health treatment for Jane Doe 1, and her eagerness to accept the transfer to Jane Doe #1 into their home in Danville, Illinois. Nicole Eason presented her and Calvin as loving parents dedicated to the well-being of the children already in their care and any new children they would have an opportunity to care for. Calvin said he worked in an automotive factory; Nicole said she was employed as a real estate investor. Notably, Custodial Parent 1 stated that Nicole Eason claimed to work at an attorney's office. Custodial Parent 1 said that everyone in the Yahoo! Group was "duped by them." Nicole Eason told Female Adoptive Parent 1 that one of her children was also diagnosed with a behavioral disorder similar to Jane Doe 1 and that she had experience with respite care and adoption. Adoptive Parents 1 thought the Easons would know better how to deal with Jane Doe 1's issues.

12. Based on the representations made by the Easons through their online and telephonic communications, Female Adoptive Parents 1 agreed to transfer custody of Jane Doe 1 to the Easons. Male Adoptive Parent 1 drove from the state of California to Danville, Illinois with Jane Doe 1. Male Adoptive Parent 1 described the house on Chandler Street as an older single family residence with a carport. Male Adoptive Parent 1 said that it appeared clean and did not observe any animals in the residence. He said the home was modestly furnished and did not see a TV in the living room. When they arrived at the residence, another minor, John Doe 2⁷ was present. Adoptive Parents 1 agreed to leave Jane Doe 1 with the Easons (as a form of respite care) on a trial basis. If the placement worked out well for both sides, they would consider longer term options, including a permanent transfer of custody. Adoptive Parent 1 stated that they signed an "Authorization for Guardianship of Minor" per Custodial Parent 1's recommendation. As part of the agreement to transfer Jane Doe #1 to the Easons, the Eason's promised Adoptive Parents 1 and Custodial Parent 1 that they would provide a copy of the "home study waiver," but never did.

13. Adoptive Parents 1 communicated with Jane Doe 1 on a frequent basis, but became concerned when they learned that Calvin Eason bathed her. Female Adoptive Parent 1 told Nicole Eason that she thought this was inappropriate, but Nicole Eason dismissed her concerns. Female Adoptive Parent 1 became increasingly

⁷ John Doe 2, was a teenage minor child in 2007. ME also introduced John Doe 2's adoptive parents to the Easons through the Yahoo! Group.

suspicious when the Easons ignored her repeated requests for a copy of the “home study waiver.”

14. Shortly after John Doe 2 and Jane Doe 1 were “re-homed” to the Easons, a woman named LB⁸, who monitored adoption scams, contacted Custodial Parent 1. LB told Custodial Parent 1 that Nicole Eason could not obtain a valid home study and had some prior criminal history.

15. Custodial Parent 1 stated that she felt responsible for Jane Doe 1 and John Doe 2, having introduced both their adoptive parents to the Easons. She contacted the adoptive parents and told them she was concerned for the children’s safety. Both adoptive parents stated they could not travel to Illinois to retrieve the children. Custodial Parent 1 worked with her attorney and obtained a “power of attorney” from Adoptive Parents 1 and John Doe 2’s adoptive parents to retrieve the children. Once she obtained the “power of attorney” documents, she traveled with a friend to Illinois to retrieve Jane Doe 1 and John Doe 2.

16. Custodial Parent 1 contacted Nicole Eason and demanded the children back. She told Nicole Eason that she had lied to the group and misrepresented who she was. Nicole Eason agreed to relinquish the children to Custodial Parent 1.

17. When Custodial Parent 1 arrived at the Eason’s residence, she observed a tiny, ramshackle blue house. Calvin Eason opened the door and Custodial Parent 1 observed John Doe 2 smoking a cigarette and Jane Doe 1 next to a puppy. Custodial Parent 1 described the house was very dirty and all the doors to the rooms were

removed. She also saw something “dead” on the floor covered in ants. The only furnishings she saw were a chair, couch and a TV. The house had a foul odor which lingered in the children’s belongings even after they left. Custodial Parent 1 said that Calvin Eason appeared angry, but told the children, “Get your shit and go.” The Easons retained Jane Doe 1’s birth certificate, social security card and baby pictures, that Adoptive Parents 1 provided them.

18. Jane Doe 1 did not disclose any abuse at that time. She has resided with Custodial Parent 1 since May 2007.

19. John Doe 2 ended up in foster care until he turned 18. When interviewed, in June 2014, John Doe 2 did not disclose any sexual abuse that he suffered from the Easons, but told FBI agents that Jane Doe 1 confided that the Easons took sexually explicit pictures or possibly videos of her while they resided with the Easons together.

20. On April 2, 2015, Special Agent Huckstadt interviewed L.B. She corroborated many of the facts that Custodial Parent 1, and Adoptive Parents 1 related above. LB was involved in several adoption groups on Yahoo! and hoped to prevent adoption scams. Through these groups she met Nicole Eason. Nicole Eason claimed to have a home study, but upon inspection, LB observed that the home study appeared to be copied and pasted from an adoption website, and was therefore fraudulent.

21. LB learned that Nicole obtained custody of John Doe 1 and represented her husband to John Doe 1’s adoptive parents as “Randy,” however LB noted that her purported home study indicated that her husband’s name was Calvin. She located several profiles that Nicole Eason had on website where she appeared to have posted


nude pictures of herself. LB felt that Nicole Eason's purpose in obtaining the children was sexually based. She explained that Nicole Eason knew "what these desperate parents wanted to hear" and "grabbed up the most vulnerable children."

22. L.B. located Nicole and Calvin Eason on a social networking website. On this same social networking site, I observed each of their public profile pictures and noted that Nicole and Calvin Eason's profile picture resembles other photographs of the Easons that I have reviewed during this investigation. Nicole Eason's cover photo was uploaded on April 1, 2015 at 2:48 pm. The photo depicts a boy approximately 5-7 years old sleeping on what appears to be a couch. There is one comment from what appears to be Calvin Eason. On April 1, 2015, at 2:51pm, Calvin Eason left the following comment to the cover photo, "Sleeping like a baby."


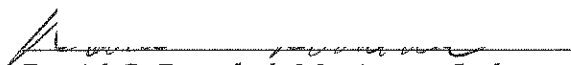
23. Based on the forgoing facts, I have probable cause to believe that the Calvin and Nicole Eason unlawfully inveigled and held for ransom or reward or otherwise Jane Doe 1 and caused the transportation of Jane Doe 1 in interstate and foreign commerce and used the mail or any means, facility, or instrumentality of interstate and foreign commerce in committing or in furtherance of the offense in violation of 18 U.S.C. § 1201, and transported and caused to be transported Jane Doe 1

with the intent that Jane Doe 1 engage in illegal sexual activity for which any person can be criminally charged, in violation of 18 U.S.C. 2423(a).

FURTHER AFFIANT SAYETH NOT.

 s/Justin Tennyson _____
Justin Tennyson, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 3rd day of April, 2015.

 s/David G. Bernthal
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David G. Bernthal, Magistrate Judge
United States District Court