

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kenneth James Smith, Jr.

Case No. 4:26-mj-30256

Judge: Ivy, Curtis

Filed: 05-05-2026

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 14, 2025-May 5, 2026 in the county of Livingston 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:

There is probable cause to believe that Kenneth James Smith Jr. committed violations of 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Continued on the attached sheet.

B-C-sc

Complainant's signature

Brian Cawrse, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence and/or by reliable electronic means.

Date: May 5, 2026

City and state: Detroit, MI

Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Brian Cawrse, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 2022 and am currently assigned to the FBI Detroit Division. While employed by the FBI, I have participated in many aspects of federal investigations including, but not limited to, subject, victim, and witness interviews, analysis of telephone and financial records, and the preparation and execution of arrest and search warrants. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting federal investigations.

2. I have received training in the area of child pornography and child exploitation and have reviewed examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2251, 2422(b), and 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Kenneth James Smith Jr. (SMITH), for violations of 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, information gathered from investigative sources of information and my experience, training, and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing a complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only facts necessary to establish probable cause that SMITH has violated 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

PROBABLE CAUSE

6. On October 22, 2025, FBI Detroit was signed into a BitTorrent Peer-to-Peer file sharing program¹ from an internet connected computer. Peer-to-Peer file sharing systems allow internet users to share electronic files, including images and videos, and its users are generally anonymous to each other.

7. That same day, FBI Detroit identified a computer using Internet Protocol (IP) address 98.250.124.113 (the “SUBJECT COMPUTER”) as a potential download candidate because approximately 25,761 files of investigative interest were observed. A file of investigative interest is defined as a file associated with

¹ BitTorrent is a peer-to-peer file sharing network.

keywords or hash values related to material consistent with the federal definition of child pornography

8. October 23, 2025, results were received from an administrative subpoena sent to Comcast for the dates and times the files of child pornography were downloaded. Based on the information provided by Comcast, during the relevant time period, IP address 98.250.124.113 was assigned to Ken Smith, and both the billing and service address for IP address was an address in Howell, MI 48843.

9. After identifying the SUBJECT COMPUTER, FBI Detroit did additional research on IP address 98.250.124.113. Specifically, a search for the aforementioned IP address was conducted on an FBI undercover computer that monitors child pornography shared on BitTorrent. By searching for IP address 98.250.124.113 on the undercover computer, FBI Detroit was able determine that between October 16, 2024 and July 22, 2025, a computer using IP address 98.250.124.113 shared several thousand files categorized into folders with the undercover computer. The files downloaded from the computer using IP address 98.25.124.113 had file names consistent with names used for files containing child pornography. I was able to view these files and many of them contained images that meet the federal definition of child pornography.

10. One file that was downloaded from the SUBJECT COMPUTER using IP address 98.250.124.113 on July 21, 2025, contained a folder titled “3 Sis...” that

contained a series of 72 still images. I reviewed some of the images in the aforementioned folder and observed the following images that met the federal definition of child pornography, to include the following:

- a. An image of a pre-pubescent female displaying her genitals for the camera.
- b. An image of two pre-pubescent females performing oral sex on an adult male.
- c. Multiple images of an adult male engaging in vaginal intercourse with a pre-pubescent female.

11. On April 20, 2026, I reviewed a law enforcement sensitive database that indicated a device using IP address 98.250.124.113 had downloaded or made available for download the same files of interest on the BitTorrent network in approximately 5000 instances between January 14, 2025 and April 20, 2026.

12. On May 5, 2026, the FBI executed a federal search warrant at SMITH's residence in Howell, Michigan. During the search, multiple external hard drives and other forms of removable storage were located. Three of those external drives were found hidden in the ceiling of the basement. A preliminary review of one of the hard drives found in the ceiling, an approximately 2TB external hard drive, contained approximately 1.55 TB of media saved on it was conducted on scene. During the preliminary review, I observed a folder title "Best" that contained approximately 11

GB of media. I reviewed the following videos in the aforementioned folder that met the federal definition of child pornography, observed the following:

- a. A video, titled "1_11662...", that showed an adult male vaginally penetrating what appeared to be a female toddler's vagina with his penis.
- b. A video, titled "9yo Australia (UA)", that showed a nude prepubescent female masturbating.
- c. A video, titled "[000153]", that showed a nude prepubescent female inserting a hairbrush into her vagina.

13. The review of the approximately 2 TB external hard drive, and other hard drives and removable storage that was located is still ongoing.

14. During the search of his residence, FBI Agents and Task Force Officers located a desktop computer in the basement laundry room, that appeared to be disassembled and placed in the sink. The desktop computer appeared to be wet, as if the faucet had been turned on while the computer was in the sink.

CONCLUSION

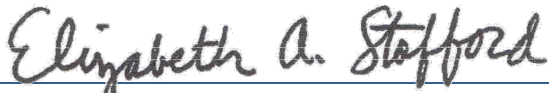
Based on the foregoing, there is probable cause to believe that Kenneth James Smith Jr. committed violations of 18 U.S.C. § 2252A(a)(2) (distribution and receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Brian Cawrse, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means on this 5th day of May, 2026.



Hon. Elizabeth Stafford
United States Magistrate Judge