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AO 91 (Rev. 11/11) Criminal Complaint

United	UNITED STATES DISTRICT COURT for the Southern District of Texas		
United States of America v. Clinton Harnden)) Case No. 4:23-mj-2048)))	Nathan Ochsner, Clerk of Court	
Defendant(s)	CRIMINAL COMPLAINT		

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

18 USC 2252A(a)(2)(B) 18 USC 2252A(a)(5)(B) Receipt of Child Pornography Possession of Child Pornography

This criminal complaint is based on these facts:

See Attached

 \checkmark Continued on the attached sheet.

Complainant's signature

Dimitri Willis, FBI Special Agent Printed name and title

Sworn to telephonically.

Date: November 13, 2023

City and state:

Houston, Texas

Judge's signature

Yvonne Y. Ho, U.S. Magistrate Judge Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Comes now your affiant, Special Agent Dimitri L. Willis, being duly sworn, depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and federal law enforcement officer within the meaning of Rule 41(h), Federal Rules of Criminal Procedure, and have been since January 2016. I am authorized by Rule 41(a), Federal Rules of Criminal Procedure to make application for search and seizure warrants and to serve arrest warrants pursuant to Rule 4(a) and (d)(1), Federal Rules of Criminal Procedure. I am currently assigned to the Houston, Texas Division of the FBI, Bryan Resident Agency, where I conduct a variety of investigations dealing with violent crimes. I received law enforcement training at the FBI Academy in Quantico, Virginia. Portions of my duties are dedicated to investigating cases involving violent crimes against children. Since becoming a Special Agent, I have investigated and worked with experienced Special Agents who also investigate child exploitation offenses. In the performance of my duties, I have investigated and assisted in the investigation of matters involving the possession, collection, production, advertisement, receipt, and transportation of images of child pornography. I have been involved in searches pertaining to the possession, collection, production, and transportation of child pornography through either the execution of search warrants or through the subject providing written consent to permit a search. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Section 2252A, as well as Texas state statutes which criminalize the production, possession, receipt, and transmission of child pornography, that is, visual images depicting minors engaged in sexually explicit conduct.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of establishing probable cause to show CLINTON HARNDEN (HARNDEN), committed the below-described offense. I have not included every detail of the investigation. Additionally, unless otherwise indicated, all statement contained in

this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge.

PROBABLE CAUSE

3. Based on the facts as set forth in this affidavit, there is probable cause to believe that the information described below will show HARNDEN knowingly received and possessed child pornography in violation of Title 18, United States Code, Section 2252A.

4. The facts and circumstances alleged in this affidavit occurred within the Southern District of Texas.

5. On or about November 8, 2023, a search warrant was executed at the residence of SARAH CHADWICK (CHADWICK), 11 Concord Road, Pontiac, Michigan. CHADWICK was arrested on charges related to the possession and distribution of child sexual abuse material (CSAM). During a post arrest interview, CHADWICK disclosed that she regularly chatted with an individual now identified as HARNDEN on Whatsapp.

6. A search of CHADWICK's cell phone revealed that she sent a significant amount of CSAM to HARNDEN using Whatsapp. CHADWICK's telephone number was 248-513-5599. CHADWICK communicated with HARNDEN on Whatsapp using HARNDEN's mobile telephone number, 979-595-4843. HARNDEN and CHADWICK's conversations on Whatapp started around January 6, 2023 and ended about November 6, 2023, shortly before CHADWICK was arrested. Below is a screenshot from CHADWICK's Whatsapp showing she and HARNDEN were the participants of this conversation.

Participants



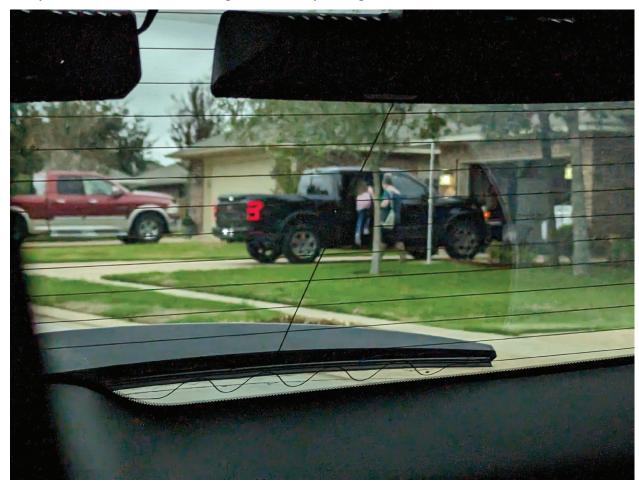
12485135599@s.whatsapp.net 11 (owner)

19795954843@s.whatsapp.net Clinton

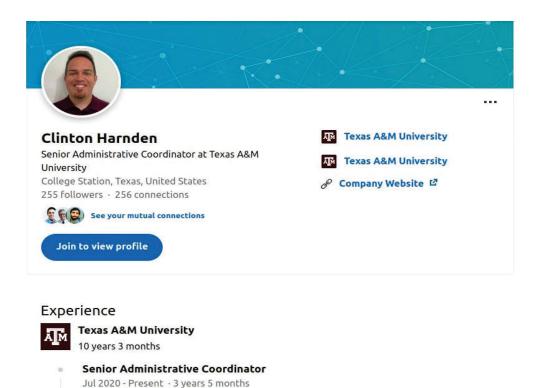
7. Open-source records showed that 979-595-4843 was a telephone number that belonged to HARNDEN. Additional open-source research revealed that HARNDEN was married to SANDRA HARNDEN, née STENGELE (SANDRA). A review of HARNDEN's

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and SANDRA's Texas Driver's License records showed that HARNDEN and SANDRA listed each other as emergency contacts. The emergency telephone number provided by SANDRA for HARNDEN was 979-595-4843. Both HARNDEN and SANDRA provided 1213 Harrisonburg Lane, College Station, Texas 77845 (1213 Harrisonburg) as a home address. In the late afternoon of November 10, 2023, FBI agents surveilled 1213 Harrisonburg and saw HARNDEN and SANDRA returning to the home. HARNDEN and SANDRA appear to have a minor daughter that resides with them. Below is a picture of SANDRA and the minor female after they returned to the home and right before they left again.



8. A further review of the chat between CHADWICK and HARNDEN showed that HARNDEN possibly worked at Texas A&M University (TAMU). CHADWICK figured out that HARNDEN was affiliated with TAMU by a ring HARNDEN wore in a picture sent to CHADWICK in the chat. Open-source research revealed an individual named CLINTON HARNDEN was employed by TAMU. A Linkedin page showed that HARNDEN was employed by TAMU as a Senior Administrative Coordinator.



9. A search of a publicly available TAMU website showed that HARNDEN was

employed by TAMU.

College Station, Texas, United States

DEPARTMENTS » INFO FOR »		ŝ	Giving Contact	College of Engineering Home Q	
Wm Michael Barnes '64 Department of Industrial & Systems Engineering	ABOUT » ACADEMICS ?	» ADMISSIONS & AID »	RESEARCH »	PEOPLE »	PARTNER WITH US »
Home Industrial People Clint Harr	nden				
Clint Harnden					
Senior Administrative Coordinator					
Phone: 979-845-5535 Of	fice: ETB 4029	ees			
Email: <u>clintonharnden07@tamu.edu</u>					

10. Further records check with TAMU revealed that HARNDEN was currently employed by TAMU and was last paid by TAMU on November 1, 2023. HARNDEN's listed address with TAMU was 1213 Harrisonburg Lane, College Station, Texas 77845.

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HARNDEN's telephone number provided to TAMU was 979-595-4843. HARNDEN had two vehicles associated with his TAMU account. A black Ford F-150, Texas license plate PSN6042 and a white Chevy 4 door, Texas license plate DD1W990. Agents saw the black Ford truck arrive at 1213 Harrisonburg in the late afternoon of November 10, 2023, and a man that resembled the known pictures of HARNDEN got out and went into the house.



11. Selfie images shared in the chat between HARNDEN and CHADWICK were compared to known photos of HARNDEN, and they appear to be the same person.

12. FBI Special Agents reviewed the CSAM shared by CHADWICK with HARNDEN over Whatsapp. There were multiple images of CSAM shared within the chat. FBI Special Agents were able to confirm the CSAM contained images that met the federal definition of child pornography. CHADWICK shared multiple images of CSAM with HARNDEN on or about January 24, 2023. CHADWICK sought HARNDEN's thoughts on the CSAM material. CHADWICK and HARNDEN used the term "pizza" to talk about CSAM during this

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interaction. I know from my training and experience that "pizza" and/or "cheese pizza" is a known slang/code-word used by individuals to discuss CSAM in public forums without detection. After sharing the CSAM, CHADWICK asked HARNDEN if he thought she was horrible because of all the "pizza." HARNDEN replied that "Pizza is one of my favorite foods."

13. A further review of CHADWICK's and HARNDEN's chat revealed that HARNDEN engaged in self-pleasure around a female in his home. HARNDEN described rubbing his penis against this person's mouth and feet, and masturbating behind this person and a friend into a tissue while the female and friend were watching TV on the couch. During CHADWICK'S interview with Agents, CHADWICK disclosed that HARNDEN revealed he liked to masturbate on his daughter.

14. A further review of the chat between CHADWICK and HARNDEN revealed multiple images that contained CSAM. Below are descriptions of a few of the images that were reviewed by Agents:

- a. IMG-0831: "The Jazz Guide" instructs individuals how to have sexual intercourse with female children in the following age ranges: 2 years of age; 3-4 years of age; 5-6 years of age; and around 9 years of age. The guide breaks down the difference between vaginal sex and anal sex with children this age. The guide recommends whether to use fingers, sexual objects, or a male's penis for intercourse. The guide also provides a recommended duration of intercourse with the child. The guide illustrates ten minor females ranging from age of 2-9 years of age who are naked with the focal point of the image being the genitals. Eight of the images depict the minor females being penetrated by an adult male penis. The remaining two photos depict minor female genitals in unnatural poses.
- b. IMG-0302: The prepubescent female appears to be approximately between 6 and 9 years of age. The prepubescent female is laying on her back in an unnatural pose, and her vagina is exposed as the focal point of the image.
- c. IMG-0925 WA0010: An adult male utilized his penis to orally penetrate an infant child's mouth. The infant child appears to be no older than a year.

15. On November 11, 2023, a search warrant was authorized by U.S. Magistrate Judge Yvonne Y. Ho for the property at 1213 Harrisonburg. Special Agents executed the warrant on November 11, 2023.

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16. During the execution of the search warrant, agents encountered HARNDEN at 1213 Harrisonburg. HARNDEN was read his *Miranda* warnings and agreed to an interview with agents.

17. HARNDEN stated that he lived at 1213 Harrisonburg with SANDRA and his eightyear-old daughter. HARNDEN also stated that his telephone number was 979-595-4843 for approximately the last seven or eight years.

18. HARNDEN admitted that he used Whatapp to communicate with a woman he believed was named "TILLY" (TILLY) for approximately one year. A review of the Whatsapp chat between CHADWICK and HARNDEN revealed that CHADWICK told HARNDEN her name was "TILLY."

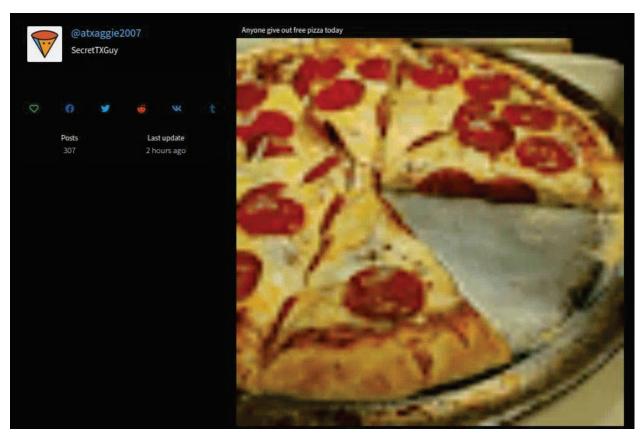
19. HARNDEN stated the woman known to him as TILLY (CHADWICK) would send him batches of CSAM every few months. Using his daughter's age as a reference, HARNDEN stated that some of the children in the CSAM were less than eight years old. The children in the CSAM that were younger than eight years old were penetrated by the penis of adult males. HARNDEN admitted that he knew it was 100% wrong for an adult male to have sex with a child that age.

20. CHADWICK told HARNDEN she had an interest in CSAM. HARNDEN did not ask CHADWICK to stop sending him CSAM or end the text relationship with her. Instead, HARNDEN accepted all the CSAM that CHADWICK sent him. Additionally, HARNDEN would provide positive feedback about the CSAM to please CHADWICK and to continue the relationship with CHADWICK.

21. HARNDEN originally met CHADWICK on Tumblr. Tumblr is a microblogging and social networking website. HARNDEN stated his username on Tumblr was "ATXAGGIE2007".

22. Agents reviewed HARNDEN's "ATXAGGIE2007" Tumblr page. The page was filled with posts and responses about pornographic material, including CSAM. One post by HARNDEN on Tumblr asked "Anyone give out free pizza today." As stated before, I know from my training and experience that "pizza" and/or "cheese pizza" is a known slang/code-word used by individuals to refer to CSAM.

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23. HARNDEN also chatted with a woman named "MONICA" on Snapchat. Snapchat is an instant messaging app and service where one of the principal features is that pictures and messages are usually only available for a short time before they become inaccessible to their recipients. MONICA liked role playing, CSAM, incest, and pedophilia role play. MONICA sent CSAM images to HARNDEN on Snapchat.

24. MONICA also instructed HARNDEN to join Wickr. Wickr is an instant messenger application service that allowed users to exchange end-to-end encrypted and content-expiring messages. Wickr users can also create groups where up to 500 individuals can be added to exchange messages, images, and videos.

25. After HARNDEN joined Wickr, he was added to a group named "Moms". Moms was a Wickr group dedicated to sharing CSAM images of boys and girls aged 7-8 years old and up. CSAM was constantly shared in the Moms group. HARNDEN would have 20 to 30 new messages from the group every time he logged into Wickr. HARNDEN did not remove himself from the Moms group.

26. HARNDEN described some of the children in the CSAM shared in the Moms group as being of Eastern European or Indian descent based on their looks. Some of the children in

the CSAM videos spoke Spanish. HARNDEN was not sure if the children that spoke Spanish were from Spain or Latin America. HARNDEN knew how the children looked and spoke in the CSAM videos because he viewed the CSAM after receiving it.

27. On one or two occasions, HARNDEN masturbated in his daughter's room while his daughter was in bed sleeping. This happened on nights HARNDEN communicated with MONICA about CSAM and incest pedophilia role playing. MONICA and HARNDEN role played committing extreme, aggressive, and violent acts with his daughter. MONICA liked to demean HARNDEN's daughter by calling her degrading names like cunt and slut. HARNDEN recalled that at some point, MONICA sent a picture or said something that led HARNDEN to masturbate next to his daughter's bed while his daughter was sleeping in the bed.

28. HARNDEN downloaded pornography that he viewed on different websites and applications onto his cellphone. This possibly included CSAM that he received and viewed, but HARNDEN could not remember exactly if or how much would be in the secure folder of his cell phone.

29. Based on a review of the information in this case and based on my knowledge and experience with violent crimes against children, I, as your Affiant, have probable cause to believe that CLINTON HARNDEN did knowingly commit the offense of receiving and possessing child pornography in violation of Title 18, United States Code Section 2252(A)(a)(2) and 2252A(a)(5)(B).

Respectfully Submitted,

Dimitri L. Willis, Special Agent Federal Bureau of Investigation

Sworn to me by telephone this 13th day of November, 2023, and I find probable cause.

Y ONNE Y HØ UNITED STATES MAGISTRATE JUDGE