

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

MAY 20 2022

CLERK OF COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

United States of America

v.

Case No. 22-MJ-6095

DANA CURTIN

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 May 19, 2022 in the county of Peoria in the
Central District of Illinois, the defendant(s) violated:

Code Section

Offense Description

18 USC Sections 1591(a) and (b) Attempted Sex Trafficking of a Minor
(1), 1594

This criminal complaint is based on these facts:

See attached Affidavit

s/ Kurt Bendoraitis

☒ Continued on the attached sheet.

Complainant's signature

KURT BENDORAITIS, FBI SPECIAL AGENT

Printed name and title

Sworn and subscribed to me telephonically pursuant to Fed. R.
Crim. P. 41(d)(3) and Rule 4.1.Date: 05/20/2022City and state: Peoria, IL

Judge's signature

Jonathan E. Hawley, United States Magistrate Judge

Printed name and title

AFFIDAVIT

Kurt Bendoraitis, Special Agent, being duly sworn on oath states as follows:

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(a), 2252A, and 2422(b) 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. This Affidavit is made in support of a criminal complaint to arrest **Dana Curtin**, a 48-year-old, white male, born in November of 1973, for violations of federal law involving minors, specifically, Title 18, United States Code, Section 1591 (sex trafficking of a minor).

STATUTORY AUTHORITY

3. This investigation concerns alleged violations of 18 U.S.C. § 1591 involving sex trafficking of minors. That statute makes it unlawful for anyone who knowingly in or affecting interstate or foreign commerce, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes or solicits by any means, a person or benefits, financially or by receiving anything of value, from the participation in a venture, knowing or in reckless disregard of the fact that the person had not attained the age of 18 and will be caused to engage in a commercial sex act, and attempts and conspires to do the same.

INVESTIGATION

4. On March 9, 2022, an FBI Online Covert Employee (OCE) posted an advertisement on the website "skipthegames.com" to identify individuals attempting to sexually exploit minors online. In your Affiant's training and experience, "skipthegames.com" is mainly used for prostitution. Generally, users will post their advertisements, selling sexual encounters for monetary gain. OCE's advertisement was titled "Tabu Fun" and stated "If your looking for some taboo no limits fun, here's your girl. 200 - hr, 150 - hhr, 125 - qv". The final portion of the title used language commonly found on skipthegames.com and other online sites to refer to prices, meaning \$200 for an hour, \$150 for a half hour, an \$125 for a quick visit. The post included two photographs of an FBI confidential human source (CHS) with the face of the CHS blocked out in the advertisement. The post also included a phone number to contact OCE.

5. Also on March 9, 2022, a user with telephone number 309-369-5758 (Subject), sent a text message to OCE in response to the advertisement. The text message conversation continued through May 19, 2022. In it, the Subject discussed paying \$150 for a half hour with a 12-year-old girl and arranged to meet. The following is an excerpt of the conversation:

Subject: Available tomorrow early afternoon

OCE: Yep How long u want

Conversation continues on March 10, 2022:

Subject: If you're available for incall a hhr would be great

OCE: What time? What u looking to do

Subject: 2:00ish

Subject: Looking to do?

OCE: Like she doesn't do anal just making sure u know

Subject: Who is this?

Subject: Thought I was talking to her?

OCE: I'm her dad. I posted the ad for her

Subject: the age in the ad says 99?

OCE: Well shes a lot younger than that

Subject: What part of town is incall?

OCE: Near the old mall

Subject: Ok thanks

Subject: Am I meeting both of you?

OCE: No need to meet me

Subject: Around 2:15 work?

Subject: That a no?

OCE: Sorry its gotta be after 3 cuz she doesnt get home from school until then

Subject: High school?

OCE: Umm rather not say

OCE: Shes 12

Subject: Lol. So you're just messing around on here.

OCE: Not fucken around just need the \$\$

Subject: At your house?

Subject: ?

Subject: So you are fucken around

OCE: No hotel or car fun

OCE: Sorry hotel or car

Subject: Thought you said incall but thanks

OCE: I can bring her to u

Subject: I'll try this o.

Subject: Weekend

OCE: Lemme knw when

Subject: Is this some sort of setup or something?

OCE: No

OCE: Are u a cop

Subject: Absolutely not

OCE: Good

Subject: Shes ok with all this.

Subject: Seen guys before?

OCE: Yea she has

Subject: Ok

OCE: Yep

Subject: Did you mean to text me?

OCE: That wasn't ment for u lol

Subject: Lol ok

Conversation continues on March 12, 2022:

Subject: So where would we meet?

Subject: ?

Subject: Hello

Subject: Hey

Conversation continues on March 13, 2022:

Subject: What's up?

Subject: If you're not available lmk

Conversation continues on March 14, 2022:

Subject: Damn

OCE: Sorry we were busy all weekend

Subject: No problem. I'll get ahold of you when I'm available after 3:00. Thanks.

OCE: Cool

Conversation continues on March 16, 2022:

OCE: What's up

Subject: Not much

OCE: Sounds fun

Subject: Lol

Subject: Tons

OCE: U still looking for some lil [cat emoji]

Subject: Meet sometime to make sure things are legit?

OCE: Wdym (commonly refers to "what do you mean")

Subject: Just never encountered a situation like this.

OCE: Oic. Well just looking to make some \$\$\$. We made a lot over the weekend

Subject: Ignored me over the weekend lol

OCE: Sorry first come first serve lol

Subject: I forgot. Incall or....

OCE: Either work

Subject: If incall is available that's cool

OCE: That works

Subject: So after 3:00 is availability

Subject: What neighborhood?

OCE: Yea starting tomorrow. And near the old mall

Subject: Like what main road. How much notice do you need?

Subject: Hello

Subject: You disappeared

Conversation continues on March 17, 2022:

OCE: Just lemme know when ur looking

Subject: Ok

Subject: Incall after 3:00 today right?

Subject: LMK

Subject: Ignoring me again lol

OCE: Sorry dude. Shes feeling sick today

Subject: Ok thanks

Conversation continues on March 18, 2022:

Subject: What's up

OCE: Nm

OCE: Hbu

Subject: Available tomorrow? Or busy again lol

Subject: Specific time that works best?

Conversation continues on March 19, 2022:

OCE: Sorry dude shes not available. She just got her first period. Fuck I know shit bout this lol. Shell be good in a cpl days thou

Conversation continues on March 25, 2022:

Subject: ?

Conversation continues on March 26, 2022:

OCE: What's up

Subject: Just checking in.

OCE: Cool u still wan her

Subject: Lmk me know when

OCE: Cant be today but should be free tomorrow

Subject: Ok. Incall still good?

OCE: Yep

Subject: Tomorrow sounds awesome.

Conversation continues on March 27, 2022:

Subject: Is there a time that works best?

Subject: Well crap

Subject: Lmk

Subject: Or not

Conversation continues on March 28, 2022:

OCE: Idk what happened but like just got all ur messages

Subject: That's weird. Lmk a good day/time.

Subject: Today work?

OCE: Cant today but tomorrow works

Subject: Ok cool. 2:30ish work?

OCE: Make it 3? Gotta pick her up from middle school and doesn't get put until 245

Subject: Oh ok. Thought it was spring break.

OCE: No that's not till closer to easter

Subject: 3:00 tomorrow sous great. Where will I be headed?

OCE: I can get a hotel room unless u got one already

Conversation continues on March 29, 2022:

Subject: You have a hotel room?

Subject: ???

Subject: Hello

Subject: Damn

OCE: Hey couldn't get a room for a decent rate today

OCE: No one else lined up today so a hotels not rly worth the 200 if u wanted akh r

OCE: An**

Conversation continues on March 31, 2022:

Subject: Feel free to lmk when you have an incall set up and I'll come.

Conversation continues on April 27, 2022:

OCE: Hey u still want this lil [cat emoji]

Subject: Sure

OCE: How long u want

Subject: What are my options?

OCE: 200 hr 175 hhr 125 qv

Subject: What's qv

OCE: Quick visit, like blow job

Subject: So different prices gets extra services

OCE: what u wanting?

Subject: I have 150

OCE: U can get a hhr

OCE: She doesn't do anal

Subject: When and where.

OCE: Could do tomorrow after I pick her up from middle school

Subject: Oh I thought you meant today. Can't tomorrow.

OCE: Ohhhh lemme see if I could move something's around

OCE: What time would work for ya

Subject: 3:00ish. Incall?

OCE: That could work

OCE: U ever been with a 12yo before? I'm onl asking to make sure u don't go tip to balls deep in the first pump cuz my only rule is no pain

Subject: I haven't

Subject: LMK

OCE: I'll know for sure in bout 20 mins. Not sure if I could get out of work early today

OCE: I'm sorry I cant get off that early

Subject: Ok thanks

OCE: Hmu tomorrow or later

Subject: Where would we get together if I can come later?

OCE: Probably a hotel unless u got a better place

Conversation continues on May 13, 2022:

Subject: How's everything

Conversation continues on May 18, 2022:

OCE: Good

OCE: Hru

Subject: Love to get together

Conversation continues on May 19, 2022:

OCE: Yea!

OCE: We could be good today

Subject: Ok lmk the plan.

OCE: How long u want this sweet 12yo pussy

Subject: I'm not sure what 12yo means and don't wanna know but I think 150 half was what we talked about last time

OCE: Umm shes 12 remember. And yes 150 works for half. U got condoms?

Subject: Sure.

Subject: I honestly can't remember the ad it's been so long ago. Don't remember looks or anything.

OCE: [photograph of an FBI Confidential Human Source (CHS) utilizing a filter to appear younger sitting at a table eating something out of a bowl]

Subject: Ok. Just lmk the plan

OCE: Does 4 work for u

Subject: I can tell you a little closer to 4. But it should. 4:30 at the latest.

OCE: That works

OCE: Lmk u close to the heights

Subject: Yeah. Not too far

OCE: Just send me a pic of the cash for verification. Been fucked over before

Subject: [image of 150 dollars cash (7 20-dollar bills and one 10-dollar bill) with a hand holding the cash]

OCE: Ur good

Subject: Where will we be meeting

OCE: Near the heights. And she doesn't do anal

OCE: Nvm let's go by the old mall at the residence

Subject: We can do near the heights

OCE: Ok. Sounds good

OCE: Hey let's meet at the star bucks in the heights

OCE: The one by emos

Subject: Then what

OCE: either go back to my place unless u got a spot by here or does ur car have tinted windows

Subject: Your place is good. Want me to just come there?

OCE: Tbh I'd rather make sure ur legit b4 u get my address

OCE: We live like 2 mins from there and could walk if it wasn't so fucken hot haha

OCE: She was asking if u were looking for a bj or just sex

Subject: Both? Thought we just have a half hour to play.

OCE: Yeah u do. She just asking me so I wanted to let her know

OCE: Dude way? If u don't want this lil [cat emoji], it's cool but lemme know so were not waiting around all day

Subject: 20 minutes

OCE: [thumbs up emoji]

Subject: You there

OCE: No are u there?

OCE: Be there in 2

Subject: Ok

OCE: Can u get her a dragon fruit smoothie from starbuck? I'll take off 25 from the price

OCE: Almost there

6. Agents conducted open source and law enforcement database checks for telephone number 309-369-5758. The checks revealed the telephone number was used by Dana Curtin from Metamora, IL. Agents then conducted checks for Dana Curtin from Metamora, IL and a photographic identification was obtained from the Illinois Secretary of State along with a possible vehicle, a red 2014 Dodge Ram 1500 with Illinois license plate 1489675B.

7. On May 19, 2022, at approximately 4:15PM, FBI Special Agents and Task Force Officer set up surveillance at the Starbucks located at 3706 N Prospect Road, Peoria, IL. At approximately 5:13PM, surveillance observed a Red Dodge Ram 1500 with Illinois license plate 1489675B pull into the Starbucks parking lot. This was approximately the same time OCE received the message "You there". Then, FBI Special Agents converged on the vehicle and placed the driver under arrest. The driver was identified as Dana Curtin. A mobile phone was seen in the vehicle near the driver's seat. OCE called the Subject's telephone number and the phone in the vehicle began to ring.

8. Curtin was then brought to an FBI issued vehicle to be interviewed. Curtin was provided his Miranda Warnings via an FBI Advice of Rights form. Curtin agreed to speak with Agents and provided the following information: Curtin was talking with a

guy after responding to an advertisement on "skipthegames". The guy told Curtin the advertisement was for his daughter. Curtin stated the daughter was 12 years old and in middle school. Curtin stated he was at Starbucks to see if the daughter was real and was then going to tell someone. Curtin stated he was not going to have sex with the 12-year-old. Curtin stated he had approximately 290 dollars in his wallet and had condoms in his car. The condoms had been in his center console for approximately a month. Curtin stated his wife did not know about the condoms in his vehicle. Curtin had paid for sex with prostitutes from "skipthegames" over 10 separate times. Curtin did not tell anyone he was going to Starbucks and did not call the police. Curtin stated sex was implied while using "skipthegames" because it was in the advertisements. Curtin consented to allow Agents to search his vehicle.

9. Special Agents and TFO then searched Curtin's vehicle. Found in the center console were two condoms. Also found in the vehicle was Curtin's wallet. There was 240 dollars in cash and 150 dollars of the total cash was separated from the other cash inside the wallet.

FURTHER AFFIANT SAYETH NC^{s/} Kurt Bendoraitis

Kurt Bendoraitis, FBI Special Agent

Attested to by the application in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 20th day of May 2022.


JONATHAN E. HAWLEY
United States Magistrate Judge