

UNITED STATES DISTRICT COURT

for the

Eastern District of Kentucky

United States of America)

v.)

Kevin Daniel Lentz)

Case No.)

5:23-mj-5290)

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 19, 2023 in the county of Fayette in the Eastern District of Kentucky, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include § 18 U.S.C. 2251(a) and § 18 U.S.C. 2422(b) with corresponding offense descriptions.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent James F. Bugg, which is incorporated and made a part hereof.

Continued on the attached sheet.

/s/ James F. Bugg

Complainant's signature

James F. Bugg, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/11/2023

Matthew A. Stinnett (Handwritten signature)

Judge's signature

City and state: Lexington, Kentucky

Matthew A. Stinnett, US Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
LEXINGTON**

CRIMINAL CASE NO. 5:23-mj-5290

IN THE MATTER OF CRIMINAL
COMPLAINT FOR KEVIN DANIEL LENTZ

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT**

I, James F. Bugg, a Special Agent (SA) with Homeland Security Investigations (HSI),
being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the U.S. Department of Homeland Security, Homeland Security Investigations (HSI) for three years and am currently assigned to the Northern Kentucky office.

2. While employed by HSI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I am responsible for investigations involving the production, importation, receipt and distribution of child pornography that occur in the Eastern District of Kentucky. I have participated – in all aspects – in investigations involving these offenses. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251 and 2422(b), and I am authorized by law to request

an arrest warrant. Swearing to this affidavit, I am relying on information provided to me by James Gilbert, who has been a Detective in Crimes Against Children Unit since 2019 and the Internet Crimes Against Children Unit since 2022 with the Lexington, Kentucky Police Department.

3. Detective Gilbert has more than twelve (12) years of law enforcement experience. Detective Gilbert has investigated state and federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. Detective Gilbert has written numerous search warrants and affidavits in cases involving crimes against children. Detective Gilbert has received more than 300 hours of training during his career, many of those hours focused on investigations, with an emphasis on crimes against children, crimes involving the internet, computers, social networking investigations, and cellular phone technologies and data analysis. He has a bachelor's degree in criminal justice from Indiana University-Bloomington.

4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, the affiant has not included each fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the listed offenses.

5. For the reasons set out below, there is probable cause to believe that **Kevin Daniel LENTZ**, while in Fayette County, Kentucky, in the Eastern District of Kentucky, committed several offenses involving the sexual exploitation of children, including, but not limited to, employing, using, persuading, inducing, enticing, or coercing any minor to engage in, or to have a minor sexually explicit conduct for the purpose of producing any visual depiction of

such conduct; and using a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice an individual, who had not attained the age of eighteen years, to engage in sexual activity for which a person may be charged with a criminal offense.

STATUTORY AUTHORITY

6. This investigation concerns alleged violations of 18 U.S.C. §2251(a), relating to using a minor to produce a visual depiction of the minor engaged in sexually explicit conduct, and 18 U.S.C. § 2422(b), relating to enticing a minor to engage in criminal sexual conduct.

a. 18 U.S.C. §2251(a) prohibits a person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in, or to have a minor assist any other person to engage in, or to transport any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for purpose of transmitting a live visual depiction of such conduct if such person knows that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, or if that visual depiction was produced or transmitted using materials that have been mailed shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

b. 18 U.S.C. § 2422(b) prohibits using a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice an individual, who had not attained the age of eighteen years, to engage in sexual activity for which a person may be charged with a criminal offense.

PROBABLE CAUSE

7. On 7/11/23, Det. Gilbert with the Lexington Police Department was contacted by Det. Chris Abele with the Manchester, New Hampshire Police Department. Det. Abele advised that his department had been contacted by the parent of Victim 1, who is currently 9-years-old, because sexually explicit chats from someone they believed to be an adult and sexually explicit images had been found on Victim 1's phone. Victim 1's parents provided law enforcement with Victim 1's phone and consented to having the phone forensically examined.

8. Using a cellphone forensic extraction, Det. Abele was able to see a conversation between the victim and a subject using the phone number 1-281-947-1715. In this conversation, the content was sexual in nature and involved several nude images being sent back and forth between the subject and Victim 1. Det. Abele determined the cellphone number belonged to a company named Pinger Inc., that was used by an application called TextFree. To identify the person using the number 1-281-947-1715, Det. Abele sent warrants to Pinger, a Voiceover Internet Provider that creates mobile applications for Android and iOS devices, and Spectrum Communications. Using the results of these search warrant returns, Det. Abele was able to identify the suspect as **Kevin Daniel LENTZ**, residing at 1166 Caywood Drive, Lexington, KY 40504.

9. On 6/1/2023, Det. Chris Abele completed a search warrant to Pinger Inc. for the records related to target number "281-947-1715" belonging to Pinger Inc. Within the search warrant results, Pinger provided a customer information sheet filename "1-281-947-1715 (1581733587)". The file provided the information resolving the account to **Kevin Daniel LENTZ** from Application: TextFree. Pinger provided the account creation IP address of 74.138.124.21

captured on 3/06/2023 at 03:22:26 UTC. The account was registered with email memesofstarwars@gmail.com and utilized Pinger phone number 12819471715. The Pinger phone number was assigned to this user between 3/06/2023 at 03:22:28 and 5/07/2023 at 21:39:51.

10. Once Det. Abele received the above records and resolved the above IP address to Spectrum (Charter Communications), Det. Abele completed a search warrant on 6/28/2023 to Charter Communications for subscriber records for 3/06/2023, at 03:22:36 UTC. On July 11, 2023, Det. Abele received the returns from Charter. The search warrant provided the following subscriber information Target IP Address: 74.138.124.21 used at 3/6/2023 03:22:36 AM, GMT. The search warrant identified the account returning to **Kevin Daniel LENTZ**, residing at 1166 Caywood Drive, Lexington, KY 40504.

11. Det. Gilbert received and reviewed the Pinger records. Chat message content as well as pictures, videos, and IP logs were provided. All Pinger record timestamps are in UTC. After reviewing the files provided, it appears **Kevin Daniel LENTZ**, using number #1-281-947-1715, began messaging Victim 1 on 3/19/2023, at 01:37:27.

12. Within several minutes of starting to chat with Victim 1, **Kevin Daniel LENTZ** sends Victim 1 an image of a topless female. Several texts later, Lentz sends an image of a nude adult female with an erect penis near her face. **Kevin Daniel LENTZ** continued to send progressively more sexualized images, including apparent adult females performing oral sex on erect penises and an apparent adult female and adult male performing oral sex on an erect male penis. On 3/19/2023 at 01:44:20, **Kevin Daniel LENTZ** stated, "My dick is hard lol." Victim 1 responds "My banana feels weird." On 3/19/2023 at 02:46:24, Victim 1 then sends a screenshot

of pornography from “pornhub.com”. The following is a short exchange between **Kevin Daniel LENTZ** and Victim 1:

KDL: Nice ones! I bet you have a nice banana

V1: The way you said that makes me think that you want to suck my banana

KDL: Is it hard?

V1: No

KDL: I do wanna suck it tho

13. On 3/19/2023 at 02:49:30, **Kevin Daniel LENTZ** sends a picture of his exposed erect penis and then sends a message “Can I see yours? Of course we’ll delete all these,” to which Victim 1 states “OK,” and then sends a picture of himself with his penis exposed. The following is a conversation immediately following:

V1: Sometimes I want to lick a dick

KDL: It’s very sexy!

KDL: Nice, it’s fun to suck a cock

V1: Who

KDL: Your dick is sexy

V1: Your dick is very hairy

V1: I think it has more hair than you on your head

KDL: Lol true

V1: No, you made me want to suck a dick

V1: And I can't reach my

KDL: I want to suck on yours

V1: T

V1: Y

KDL: Do you have hair yet on yours?

V1: I mean you could, but you're too far away

V1: Let me check

V1: Small, but my ball sacks stretchy

KDL: Nice

V1: Did you read my text after I said why?

KDL: Which part?

V1: Before you said, do you have hair yet on yours?

V1: My dick said hi

KDL: Oh no I didn't see that. My dick says hi back

V1: If I had someone else's dick, I will fucking wag my dick on their dick

V1: Light saver dance

V1: With dicks

KDL: Ooh that sounds like fun!

V1: I think my dick needs to get sucked on

KDL: Yeah! I bet it tastes yummy

V1: How do you make your dick? Feel good when they're hurt or like hard

V1: If I tasted your dick, I bet I would throw up a hairball

V1: Is your dick salty?

KDL: Lol. It just tastes like regular skin I think. That's what dicks taste like

V1: You can show me a video how your dick to get feeling nice

V1: So it's like giving your dick a hickey

KDL: Yeah!

KDL: Cum tastes salty though

V1: Are you gonna send me a video how you get your dick to feel nice

V1: my brother's

V1: Don't ask me how I know

KDL: It's ok, no worries. How old is your brother just curious

V1: 19

KDL: Cool

V1: So back to the video thing are you

14. On 3/19/2023 at 03:02:23, **Kevin Daniel LENTZ** sends a 7-second-long video of him manually stimulating his erect penis. The following is the conversation immediately following the video:

V1: Pls

KDL: Did you see it?

V1: Yeah, my brother said you can get white stuff to come out your dick is that true?

KDL: Yeah! That's cum

KDL: Your brother didn't show you it?

V1: How

V1: What?

KDL: Your brother can show you how to cum

V1: What does CUM mean

KDL: When the White stuff comes out

V1: Can like someone show me how to do it

V1: I'm thirsty and I don't wanna get up and I don't wanna taste piss

KDL: You should get up and get a drink lol

V1: I'm about to drink water

V1: That's like the only drink I have

KDL: Ok cool. I gotta pee. Brb

V1: After show me, how video pls

KDL: I'm back

V1: Read my text

KDL: To cum? You have to be in puberty first

15. Throughout the rest of the conversation, the content between **Kevin Daniel LENTZ** and Victim 1 continues to be sexual in nature. On 3/19/2023 at 03:31:05, **Kevin Daniel LENTZ** asks Victim 1, "Can you send a pic that shows your face and your dick both?" In response, Victim 1 sends a picture of his face with the tip of his penis in the picture, to which **Kevin Daniel LENTZ** replies "Sexy!" **Kevin Daniel LENTZ** then sends a picture showing his face and him holding his penis.

KDL: I just turned 39 lol(I am kinda old 🤖♂️)

V1: My dad's 49 he looks younger

KDL: Oh cool

V1: OK be honest are you a pervert

V1: Just wondering

V1: Because I don't know, I'm just wondering

KDL: I mean, I am kinda obsessed with sex lol

V1: I'm curious because my friends are pervert

V1: What age?

KDL: I like all ages

V1: So take a video of your face because you said it wasn't a good angle

16. **Kevin Daniel LENTZ** then sends a picture of his face. Notably, tattoos are visible on **Kevin Daniel LENTZ's** shoulders and arms. Det. Gilbert was able to make a positive identification of **Kevin Daniel LENTZ** through these images by comparison to his Kentucky Driver's License.

17. On 3/19/2023 at 03:43:36, Victim 1 stated "Are you sure you're not bad Santa" with **Kevin Daniel LENTZ** replying "Yeah. I'm just bad Daniel lol". The conversation continues as follows:

KDL: I want to suck on a dick soooo bad rn

V1: Sucks for you

V1: Go lick those pictures of 🍆 you have

KDL: I want to suck yours

V1: Y mine

V1: You never even seen me in real life

KDL: Because it's a very sexy one

V1: Y

KDL: But you're nice and cute and your dick is sexy

V1: You be saying that the whole time

KDL: It's true tho

KDL: Send me another pic or vid of it please

V1: Geez, all right

18. Victim 1 then sends a 30-second-long video of himself manually stimulating his penis. **Kevin Daniel LENTZ** responds, "God that's so fuckin hot." Victim 1 then sends another 20-seconds-long video of himself manually stimulating his penis. **Kevin Daniel LENTZ** responds "Mmmm I want it in my mouth." Victim 1 then sends two more videos of the same content with **Kevin Daniel LENTZ** responding, "So Sexy" and "Aw yeah so hot." In each video sent by Victim 1 there is what appears to be a prepubescent male penis.

19. On 3/19/2023 at 4:12:36, **Kevin Daniel LENTZ** asks Victim 1, "Did you delete the whole conversation?" **Kevin Daniel LENTZ** then instructs Victim 1 how to delete the conversation and states "But anyway, thanks for the sexy dick picks. You're amazing."

20. Several more images were exchanged between **Kevin Daniel LENTZ** and the Victim 1, with both **Kevin Daniel LENTZ** and Victim 1 exposing their penis in the images. Six messages in total were observed to have been sent from **Kevin Daniel LENTZ** reminding Victim 1 to delete the conversation.

21. On 3/23/23 at 00:47:52, **Kevin Daniel LENTZ** sent a picture of a coffee cup that said "My Pen is Huge." Victim 1 replies **Kevin Daniel LENTZ** should buy that for him and

send it to him and he would give him his address. **Kevin Daniel LENTZ** responds “Your parents would be suspicious of it.”

22. On 03/04/2023 at 20:25:34, **Kevin Daniel LENTZ** asks Victim 1, “Any fun plans?” Victim 1 responds with no and **Kevin Daniel LENTZ** replies, “It’s comic con weekend here, should be fun.” Det. Gilbert researched and was able to determine that the Lexington Comic Con occurred in Lexington on 3/23/2023-3/26/2023.

23. During the entire conversation, **Kevin Daniel LENTZ** sent 85 images of pornography depicting various types of sexual acts involving men and women. In total, **Kevin Daniel LENTZ** sent 5 videos and 4 pictures of his penis to Victim 1 and, at the request of **Kevin Daniel LENTZ**, Victim 1 sent **Kevin Daniel LENTZ** 6 videos and 3 pictures of his penis.

24. The conversation continues until 3/29/23 at 00:44:50 where it appears Victim 1’s parent sent the following message “This is a 9 year olds phone. I am going to the police.”

25. Your affiant is aware that it would be a violation of Kentucky law for someone of **Kevin Daniel LENTZ**’s age to engage in sexual acts, including oral sex, with a 9-year-old child.

26. Your affiant knows that the term “means or facility of interstate commerce” includes the internet or telephones.

CONCLUSION

27. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that on about 3/19/2023, while in the Eastern District of Kentucky, Fayette County, **Kevin Daniel LENTZ** engaged in the following:

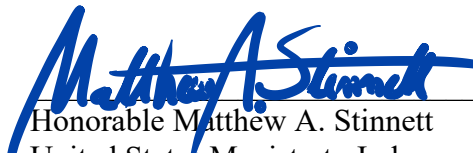
- a. knowingly used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate commerce, or that visual depiction was produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. §2251(a); and
- b. used a facility and means of interstate commerce, to knowingly attempt to persuade, induce, and entice an individual, who had not attained the age of eighteen years, to engage in sexual activity for which a person may be charged with a criminal offense, in violation of 18 U.S.C. § 2422(b).

Respectfully submitted,

/s/ James F. Bugg

James F. Bugg
Special Agent
Homeland Security Investigations

Sworn to/attested to by the affiant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means this 9th day August of 2023.



Honorable Matthew A. Stinnett
United States Magistrate Judge
Eastern District of Kentucky