

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BUCKS



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: **07-1-07**

MDJ: Hon. **DANIEL BARANOSKI**
142 CENTRE STREET
PENNDUEL, PA 19047

Address:
Telephone: **215-757-6761**

DEFENDANT: (NAME and ADDRESS):
MARK WILLIAM WILLS
First Name Middle Name Last Name Gen
310 MAIN ST
HULMEVILLE PA UNITED STATES 19047

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Ltd.
- 3-Felony Surrounding States
- 4-Felony No Ext
- 5-Felony Pend.
- 6-Felony Pend. Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending
- F-Misdemeanor Pending Extradition Determ.
- Distance:

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-26-25	Date Filed 02/06/25	OTN/Livescan Number L1010316-6	Complaint 361	Incident Number 99-24-1309	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----------------------------------	-------------------------------	--	-------------------------	--------------------------------------	--

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 06/01/1964	POB PENNSYLVANIA	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
AKA	First Name	Middle Name	Last Name	Gen.

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

HAIR COLOR

<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input checked="" type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk/Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
<input type="checkbox"/> BLN (Blonde / Strawberry)					

EYE COLOR

<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)

DNA YES NO DNA Location WEIGHT (lbs.)

FBI Number **110104DA0** MNU Number **250**

Defendant Fingerprinted: YES NO Ft. HEIGHT In.

Fingerprint Classification: **6 1**

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth Approved Disapproved Because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth Prior to filing. See Pa.R.Crim.P. 507).

KRISTIN M. MCELROY

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, **DETS ERIC LANDAMIA, KELCY PITTS; SGT. KEVIN STEBNER** **30118 42393, 32451 / 9924, 9940, 75137**

(Name of the Affiant)

PSP/MP/POETC -Assigned Affiant ID Number and Badge #

of **Bucks County Detectives, Warrington Township Police**

PA0094800

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

- I accuse the above named defendant who lives at the address set forth above
- I accuse the defendant whose name is unknown to me but who is described as _____
- I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at **[405]**

(Subdivision Code) (Place-Political Subdivision)

310 MAIN ST HULMEVILLE, PA 19047

in **BUCKS** County **[09]** on or about **Between 11/10/2024 and 01/24/2025**

(County Code)

(Offense Date)

2025 FEB 6 AM 11:02
RECEIVED
DISTRICT COOR
07-1-07



POLICE CRIMINAL COMPLAINT

Docket Number: CR-26-25	Date Filed: 02/06/2025	OTN/LiveScan Number L1010316-6	Complaint 361	Incident Number 99-24-1309
Defendant Name	First MARK	Middle: WILLIAM	Last: WILLS	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input checked="" type="checkbox"/>	1	6312	B2	of the	18	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):
Photograph/Film/Depict on Computer Sex Act - Knowingly Depicts on Computer, Photo, etc

Acts of the accused associated with this Offense:
? 6312. Sexual abuse of children.

(b) Photographing, videotaping, depicting on computer or filming sexual acts.--

(2) Any person who knowingly photographs, videotapes, depicts on computer or films a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such an act commits an offense.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	2	6312	C	of the	18	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):
Dissem Photo/Film of Child Sex Acts

Acts of the accused associated with this Offense:

The actor knowingly sold, distributed, delivered, disseminated, transferred, displayed or exhibited to others or possessed for the purpose of sale, distribution, delivery, dissemination, transfer, display or exhibition to others, a book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction or other materials depicting a child under the age of 18 years, engaging in a prohibited sexual act or in the simulation of such act, in violation of Section 6312(c) of the Pennsylvania Crimes Code, Act of December 6, 1972, Pa. C.S. -6312(c), as amended.

(Handwritten initials)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-26-25	Date Filed: 02/06/2025	OTN/LiveScan Number L1010316-6	Complaint 361	Incident Number 99-24-1309
Defendant Name	First MARK	Middle: WILLIAM	Last: WILLS	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	3	6312	D	of the	18	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

Child Pornography

Acts of the accused associated with this Offense:

The actor knowingly possessed or controlled a book, magazine, pamphlet, slide, photograph, film, videotape or other material depicting a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such act in violation of Section 6312(d) of the Pennsylvania Crimes Code Act of December 6, 1972, Pa. C.S. -6312(d), as amended.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	4	6318	A5	of the	18	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

Contact/Comm.W/Minor-Sexual Abuse

Acts of the accused associated with this Offense:

Offense defined.--A person commits an offense if he is intentionally in contact with a minor, or a law enforcement officer acting in the performance of his duties who has assumed the identity of a minor, for the purpose of engaging in an activity prohibited under any of the following, and either the person initiating the contact or the person being contacted is within this Commonwealth:

(5) Sexual abuse of children as defined in section 6312 (relating to sexual abuse of children).

(Handwritten initials)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-26-25	Date Filed: 02/06/2025	OTN/LiveScan Number L1010316-6	Complaint 361	Incident Number 99-24-1309
Defendant Name	First MARK	Middle: WILLIAM	Last: WILLS	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	5	5903	C1	of the	18	1	F2		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code	
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description (Include the name of the statute or ordinance):

Diss Explicit Sex Mat'l Minor

Acts of the accused associated with this Offense:

(o) Dissemination to minors. No person shall knowingly disseminate by sale, loan or otherwise explicit sexual materials to a minor. "Explicit sexual materials," as used in this subsection, means materials which are obscene or:

(1) any picture, photograph, drawing, sculpture, motion picture film, videotape or similar visual representation or image of a person or portion of the human body which depicts nudity, sexual conduct, or sadomasochistic abuse and which is harmful to minors; or

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	6	5703	1	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code	
PennDOT Data (if Applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description (Include the name of the statute or ordinance):

Intercept Communications

Acts of the accused associated with this Offense:

The actor intentionally intercepted or endeavored to intercept a wire, electronic or oral communication that is to say the actor recorded the video and audio of a minor child engaged in a sexual act in violation of Section 5703(1) of the Pennsylvania Crimes Code, Act of October 4, 1978, 18 Pa. C.S. -5703(1), as amended.

(Handwritten initials)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-26-25	Date Filed: 02/06/2025	OTN/LiveScan Number L1010316-6	Complaint 361	Incident Number 99-24-1309
Defendant Name	First: MARK	Middle: WILLIAM	Last: WILLS	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	7	7512	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

Criminal Use Of Communication Facility

Acts of the accused associated with this Offense:

The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, Actor used smartphones to commit the crimes of PaC.S. 18 6312, 6318, 5703, 5903, in violation of Section 7512 of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C. S.- 7512, as amended.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	8	7507.1	A1	of the	18	1	M2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

Invasion of Privacy - view, photograph, etc. person w/out consent

Acts of the accused associated with this Offense:

In that the defendant did, on or about said date, commit the offense of invasion of privacy for the purpose of arousing or gratifying the sexual desire of any person, by audio and video recording the victim in a state of nudity without that persons knowledge or consent and in a place where that person would have a reasonable expectation of privacy, in violation of Section 7507.1 (A)(1) of the Pennsylvania Crimes Code, 18 Pa. C.S.-7507.1

(Handwritten initials)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-26-25	Date Filed: 02/06/2025	OTN/LiveScan Number L1010316-6	Complaint 361	Incident Number 99-24-1309
Defendant Name	First: MARK	Middle: WILLIAM	Last: WILLS	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 6.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

ERIC LANDAMIA / KELCY PITTS / KEVIN STEINER 02/06/2025 [Signature]
 (Date) (Signature of Affiant)

AND NOW, on this date 2/6/25 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

07-1-07

(Magisterial District Court Number)

[Signature]
 (Issuing Authority)



RECEIVED
 FEB -6 AM 11:21
 DISTRICT COURT
 07-1-07

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

Probable Cause belief is based upon the following facts and circumstances:

INTRODUCTION

Your Affiant, Detective Eric Landamia, Badge #9924, of the Bucks County District Attorney's Office, Bucks County, PA, has been duly sworn/appointed/employed as a police officer in the Commonwealth of Pennsylvania since 2001. Your Affiant is certified as a Police Officer in Pennsylvania and is authorized to conduct criminal investigations and make arrests in all criminal cases. Your Affiant has investigated numerous cases involving the exploitation of children. Your Affiant is currently an affiliate member of the Pennsylvania Internet Crimes Against Children Task Force (PA ICAC). PA ICAC is specially trained and investigates crimes against children. Additionally, your Affiant is a Task Force Officer with the Federal Bureau of Investigation Violent Crimes Against Children (VCAC) division. Specifically, your Affiant is assigned to investigate crimes involving the online sexual exploitation of children.

Your Honor, your Affiant, Detective Kelcy Pitts (Badge #9940), of the Bucks County Detectives/Bucks County District Attorney's Office, has been duly sworn/appointed/employed as a Police Officer in the Commonwealth of Pennsylvania since 2013. Your Affiant is certified as a Police Officer in Pennsylvania and is authorized to conduct criminal investigations and make arrests in all criminal cases within Bucks County, Pennsylvania. Your Affiant is currently an affiliate member of the Pennsylvania Internet Crimes Against Children Task Force (PA ICAC). PA ICAC is specially trained and investigates crimes against children. Specifically, your affiant is assigned to investigate crimes involving the online sexual exploitation of children. Your Affiant has participated in numerous criminal investigations that have led to the successful execution of both search and arrest warrants, as well as prosecution.

Handwritten initials "JB" in blue ink, enclosed in a circular scribble.

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

Your honor, your Affiant is Sergeant Kevin Stebner, employed by the Warrington Township Police Department. I have been a certified Police Officer in the Commonwealth of Pennsylvania since 2003, and I am currently assigned to the Criminal Investigation Division. As a police officer, I have the ability to investigate and prosecute all manners of crimes, including crimes against children and internet crimes. I am assigned to the Delaware County Internet Crimes Against Children (ICAC) Task Force. The ICAC Task Force was created to help Federal, State, and Local law enforcement agencies enhance their investigative responses to offenders who use the internet, online communication systems, or computer technology to exploit children. The Program is funded by the United States Department of Justice, Office of Juvenile Justice and Delinquency Prevention. The ICAC Program is a national network of 61 coordinated task forces representing over 3,000 federal, state, and local law enforcement and prosecutorial agencies. The ICAC Task Force provides the training and tools law enforcement needs to successfully carry out its mission. I have received specialized training from ICAC in investigating the online enticement of juveniles, which includes online advertisements and human trafficking, as well as the possession and dissemination of child pornography through various sharing websites and social media platforms and Peer to Peer filing sharing.

I have also received specialized training in cellular telephone examinations from the National Computer Forensics Institute, and I am a Certified Cellebrite Operator. I am also assigned to the Philadelphia Area Cyber Fraud Task Force through the United States Secret Service.

Your Affiant is a sworn special Task Force Officer (TFO) with Homeland Security Investigations (HSI) in their Child Exploitation and Human Trafficking Task Force, and as such, has the authority to seek and execute arrest and search warrants supporting a Federal Task Force under Title 18 authority.

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

The facts set forth in this affidavit are based upon your Affiants' personal knowledge; knowledge obtained from other individuals/entities during our participation in this investigation, including other law enforcement personnel; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; as well as information gained through our training and experience.

Because this affidavit is being submitted for the limited purpose of establishing probable cause, your Affiants have not included every aspect, fact, or detail of this investigation.

INVESTIGATION:

On or about December 16, 2024, The Bucks County District Attorney's Office initiated the investigation of two (2) CyberTips that were submitted to the National Center for Missing & Exploited children (NCMEC). The CyberTip reports, numbered 202578741 and 199677093, were submitted by MediaLab/Kik and Snapchat, respectively. These CyberTips were received by NCMEC on November 20, 2024 and September 30, 2024.

CyberTip 202578741

The CyberTip report indicated a Kik user shared multiple Child Sexual Abuse Material (CSAM) files through their online platform between November 10, 2024 07:05:45 UTC (2:05am EST) and November 18, 2024 01:39:15 UTC (November 17, 2024 at 8:39pm EST).

MediaLab/Kik provided the following account information for the user who shared the CSAM on their platform:

<u>ESP User ID:</u>	18kevinmcbride_cc2
<u>Email Address:</u>	kevinmcbride2010@gmail.com
<u>Screen/User Name:</u>	18kevinmcbride
<u>MediaLab/Kik CyberTip:</u>	202578741

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

IP Address:

100.14.41.232

In total, the child sexual abuse material shared by Kik user 18kevinmcbride consisted of six (6) unique video files. Your Affiants reviewed these files. The following is a description of files your Affiants selected to establish probable cause:

Filename: 546aced6-0f0c-449b-a1b4-6634af199c61.mp4

MD5 Value: 79560817f26fb1ec63179b8719840926

Description: This forty second (00:40) video file begins with a brief shot of a male touching his penis in a video chat thread. The video then changes to the exposed vagina and anus of a minor female. The child rubs her vagina, spreads it open and inserts her finger during the video. The chat thread indicates one of the two (2) parties to use the username “Cailey” and appears to have occurred via Snapchat.

Filename: a772ad52-84f8-4f43-ae21-f4c34393926e.mp4

MD5 Value: 2f67a0144be052fac2acfd33def70527

Description: This thirty-one second (00:31) video file depicts one (1) naked pubescent female on all fours. Her lower half was unclothed, exposing her anus and vagina for the camera. She shakes her buttocks and moves back and forth for the remainder of the video, while her vagina remains in screen.

MediaLab/Kik also provided the device manufacturer information for the device used to register the Kik account on November 9, 2024. The device was identified as a Samsung, using the Android operating system.

IP address 100.14.41.232 was used to register the account and share the CSAM files. IP address 100.14.41.232 was learned to be assigned to an internet service provider, specifically Verizon. Verizon records received pursuant to subpoena indicated the IP address to be assigned to the following residential address:

310 Main St
Hulmeville, PA 19047

A handwritten signature in blue ink, appearing to be the initials "AB" enclosed in a circular scribble.

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – **Mark WILLS**

You Affiants are aware that this address is in Hulmeville Borough, Bucks County. A check of the residence using law enforcement resource Accurint identified residents at this address, to include Mark Wills.

CyberTip 199677093

The CyberTip report indicated a Snapchat user shared obscene files through their online platform on August 4, 2024 at 13:14:39 and 13:15:18 UTC (9:14am & 9:15am EST). The obscene material was sent to another Snapchat user from an account whose account registration information indicated the sender was a minor.

Snapchat provided the following account information for the user who shared the obscene files on their platform:

<u>Screen/User Name:</u>	kevthompson2009
<u>Snapchat CyberTip:</u>	199677093
<u>IP Address:</u>	100.14.41.232

In total, the material shared by Snapchat user kevthompson2009 consisted of two (2) unique image files. Your Affiants reviewed these files. Both files depicted a male's penis.

MEDIALAB ACCOUNT RECORDS – 18KEVINMCBRIDE

Your Affiants obtained the account records for the MediaLab/Kik account associated with user 18kevinmcbride pursuant to the execution of a search warrant for same. The account content included both text messaging logs and media files sent by the 18kevinmcbride account. Amongst the media files received as part of the search warrant production were the files reported in CyberTip 202578741.

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

After sending one of the CyberTip-reported videos, a772ad52 84f8 4f43-ae21-f4c34393926e.mp4, the 18kevinmcbride account sent the following messages:

- *“This is another girl that does whatever I tell her she's really young but she likes to be told what to do”*
- *“She told me her pussy is really tight but some boys she said like to fuck her in her ass and she loves showing her asshole”*

Additionally, the 18kevinmcbride account included several selfie-style images of an adult male, shirtless, with salt-and-pepper hair. Your Affiants compared this image with the Pennsylvania Driver’s License image of Mark Wills, D.O.B. 06/01/1964, and found it to be visually consistent with the image of the male depicted in several images within the MediaLab/Kik production for the 18kevinmcbride account. Additionally, Wills’ address on his Pennsylvania Driver’s license is 310 Main Street Hulmeville, PA 19047.

310 MAIN STREET SEARCH WARRANT EXECUTION

On January 24, 2025, a search warrant was executed at 310 Main Street Hulmeville, PA 19047. Mark Wills, D.O.B. 6/1/1964 was encountered in a living area of the residence. Seized during the execution of the search warrant were numerous electronic devices (4 phones, 1 computer, 3 USB drives) and a series of handwritten documents. These documents were located in the immediate proximity of two (2) cellular devices as well as in a nearby nightstand. Your Affiants reviewed the documents and learned the following:

The documents reflected several online accounts/identities, which listed the names of male subjects in their teenage years. The identities included names, dates of birth, email address, password and in some instances, the date/time of their creation. The identities included:

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

<u>Name</u>	<u>D.O.B.</u>	<u>Email</u>	<u>Create</u>
1. Alex Harrison	11/17/2007	alexharrison20100@gmail.com	1/9/25
Associated Snapchat account: AlexHarrison2			
2. Lorenzo Guerra	9/12/2010	lorenzoguerra20100@gmail.com	1/7/25
Associated Snapchat account: LorenzoGuerra2			
3. Antonio Romano	5/20/2006	antonioromano2006@gmail.com	1/7/25
Associated phone number: (267) 767-7675			
4. Kevin McGovern	4/25/2006	kevinmcgovern2006@gmail.com	12/22/24
Associated phone number (267) 767-7675			
This account listed a Miami zip code, 33111			
This account was crossed out on the page, with the notation: <i>“As of 1/7/2025 Tues No Longer Have This Email”</i>			
5. Unknown Name	6/15/1985	kendover1985@gmail.com	Unk
6. Austin Garver	9/09/2007	austingarver1985@yahoo.com	Unk
7. Unknown Name		topchopper1992@gmail.com	Unk
Noted for this email address: <i>“photos-pics-vids-Backed up to Top Chopper”</i>			
Associated Facebook account created 2/8/2024 Thurs			
8. Bob Smith	2007 Year	bobby2023smith@yahoo.com	1/7/23
9. Mark Wills		markwills64@gmail.com	Unk
10. Mark Wills		markwills36@gmail.com	Unk
11. Kevin O’Brien	10/7/2010	kevinobrien1007@gmail.com	12/22/24
Associated Snapchat account: Kevinobrien1007			

These handwritten documents also contained instructions on how to delete Google and Snapchat accounts and for applications which included Kik, TikTok, Snapchat, Quora, Calculator Vault and A-Z screen recorder. Your Affiants are aware that calculator vault applications offer a password-protected hidden application for the purpose of

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – **Mark WILLS**

storing/secreting files such as images and videos. There was also a page with detailed instructions on hiding applications and accessing hidden applications.

These handwritten notes also included the names/usernames of several online accounts/identities which indicated the users were female. The ages of these females listed them as being under eighteen years of age. Additionally, these documents indicated the following in some instances:

- Which of Wills' online identities made contact with the female
- If he had been blocked by the female
- What, if anything, the female provided/showed with respect to nudity
- Whether Wills ejaculated and or was caught (He used the term "busted" several times)

Examples of the above are as follows:

"[REDACTED] (14?) Said I'm (15) almost 16 Great Tits played with pussy sent vids"

"[REDACTED] (13) say I'm (14 or 15) cheerleader cam in tub huge tits shaved pussy cute as hell"

"[REDACTED] (13) said I'm (17) great tits big pussy lips smokes vaps Great pussy hear Scared Ill post her videos on Lne"

WILLS' ELECTRONIC DEVICES

Affiant Landamia conducted forensic extraction of Mark Wills' Samsung cellular phones, models Galaxy A13, A14 and A15. A review of the data extracted from these devices yielded the following information:

- Multiple artifacts relating to the online identities from Will's handwritten notes

Handwritten initials in blue ink, possibly "JB", enclosed in a circular scribble.

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – **Mark WILLS**

- Files consistent with those reported in the CyberTIPS referenced herein
- Indicia of ownership of the device in the form of communications, selfie-style images and electronic accounts associated with Mark Wills.
- Several hundred screen recordings, using programs which included the application AZ_Recorder, which contained hours of videos of Mark Wills interacting with several apparent underage females online. The first of these videos had a file date which indicated its creation date was June 16, 2024. The videos continued through January 2025. In these videos, Wills would engage in chat and video conversations with the minor females, direct them what body parts to show and/or what to do in the videos. In several videos, the apparent minor female children remove their clothing and expose and touch their vaginas. Some videos depicted the female children inserting their fingers or other items into their vaginas. Multiple video calls depicted Wills' masturbating during the call, with his penis exposed and in a smaller window within the recorded screen. Some of the Snapchat usernames of the apparent minor females which were able to be obtained from with Wills' extracted phone data.

On February 4, 2025, your Affiants were able to identify one of the female children whose communications were screen-recorded by Mark Wills. This female, hereinafter referred to as C.T., is a thirteen (13) year old female. C.T., in these videos, displayed her exposed breasts and vagina and inserted her fingers into her vagina. Audio was also captured during this recording.

The identities of the other minor females captured in the screen recorder files on Wills' phone are unknown as of this filing. Law enforcement anticipates filing additional charges/counts as the identities of these children become known.

(B)

Bucks County Detectives



BCD Case: 99-24-1309

Affidavit of Probable Cause – Mark WILLS

CONCLUSION

Based on the facts contained herein, your Affiants respectfully request a warrant of arrest be issued for Mark William Wills, D.O.B. 06/01/1964, for the following violations of the Pennsylvania Crimes Code:

- | | |
|---|-----------------------------|
| 1. Sexual Abuse of Children | Pa.C.S. 18 §6312 §§(b) |
| 2. Sexual Abuse of Children | Pa.C.S. 18 §6312 §§(c) |
| 3. Sexual Abuse of Children | Pa.C.S. 18 §6312 §§(d) |
| 4. Unlawful Contact with Minor | Pa.C.S. 18 §6318 §§(a)(5) |
| 5. Obscene and Other Sexual Materials and Performances | Pa.C.S. 18 §5903 §§(c) |
| 6. Interception, Disclosure or Use of Wire, Electronic or Oral Communications | Pa.C.S. 18 §5703 §§(1) |
| 7. Criminal Use of Communication Facility | Pa.C.S. 18 §7512 §§(a) |
| 8. Invasion of Privacy | Pa.C.S. 18 §7507.1 §§(a)(2) |

RECEIVED
2025 FEB -6 AM 11:23
DISTRICT COURT
07-1-07

Your Affiants, Bucks County Detectives Eric Landamia and Kelcy Pitts, being duly sworn according to law, do depose and say that the facts set forth in the foregoing affidavit are true and correct to the best of their knowledge, information and belief.

Your Affiants certify this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

	2/6/2025
Affiant Signature	Date
	2/6/25
Affiant Signature	Date

Issuing Authority Signature

2/6/2025

Date

