

**FILED**  
**09-26-2024**  
**Clerk of Circuit Court**  
**Washington County, WI**  
**2024CF000439**  
**Honorable Ryan J. Hetzel**  
**Branch 1**

**STATE OF WISCONSIN      CIRCUIT COURT      WASHINGTON COUNTY**

STATE OF WISCONSIN


Plaintiff,

DA Case No.: 2024WA002428  
Assigned DA/ADA: Mandy A Schepper  
Agency Case No.: 24-28995WCSD

vs.

Court Case No.:

Michael Scott Royal

  
Kewaskum, WI 53040  
DOB: 05/27/1971  
Sex/Race: M/W

**CRIMINAL COMPLAINT**

Defendant.

*For Official Use*

The undersigned, being first duly sworn, states that:

**Count 1: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or between May 17, 2024, and September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: d505004f31f5e01269f86f5611a8d32d of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 2: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 8ec0620f786cc6119b85fbd543a70b05 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall

determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 3: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 8472802d853f5451baaf8883abe41881 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 4: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: d52d856ca0982a64d047957ed3335f4f of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 5: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 7bb2bc7ac9c82bdb71e904c8d0c4092a of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 6: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 275ed9ce61c6e5697161a65f50a333a4 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 7: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 6854e1a519b357f4e0af93cffba4b0c2 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 8: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 88941ca515a5fbc3cb64c7a80b183ed2 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 9: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: eb6d17594673f719027ad335c9867cb0 of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 10: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a recording: MD5: 3dce2893b90b6319b5a249a9a54c530f of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

**Count 11: POSSESSION OF DRUG PARAPHERNALIA**

The above-named defendant on Wednesday, September 25, 2024, Washington County, Wisconsin, did knowingly possess with primary intent to use drug paraphernalia to ingest, inhale, inject, prepare, store, or otherwise introduce a controlled substance into the human body, contrary to sec. 961.573(1) Wis. Stats., a Misdemeanor, and upon conviction may be fined not more than Five Hundred Dollars (\$500), or imprisoned for not more than thirty (30) days, or both.

**PROBABLE CAUSE:**

Complainant prays that said defendant be dealt with according to law. Complainant is a sworn officer with the Washington County Sheriff's Office and bases their information upon review of the report of Detective A. Edwards of the Washington County Sheriff's Office, who reports on Tuesday, August 27, 2024, she was assigned CyberTip #193858816 through the Internet Crimes Against Children (ICAC) Data Systems. The CyberTip indicates that there were three images of apparent Child Sexual Abuse Material (CSAM) that were scanned/uploaded using BingImage. The CyberTip was received by the National Center for Missing and Exploited Children (NCMEC) on May 18, 2024, at 15:01:53 UTC. Detective Edwards reports that the tip initially went to the West Bend Police Department; however, it was transferred to the Sheriff's Office due to the current residence of the suspect.

Detective Edwards reports that she viewed the CyberTip which states, "BINGIMAGE (referred to as Visual Search) is a service that provides similar images to an image provided by the user. This image can be provided either via upload or as a URL. The Date Time provided indicates the time at which the image was received and evaluated by the BINGIMAGE service. Please note that the information contained in this CyberTip is the only information related to

this user in Microsoft systems. All reportable information has been submitted, and there is no other information regarding this user that can be supplied through additional legal process." Additionally, it states that one of the three image files was reviewed by the Electronic Service Provider. Said officer reports that the three file images (recordings) included in the CyberTip are identical hash value matches to each other.

Detective Edwards reports that based upon her review of the CyberTip, it was forwarded by NCMEC to the Wisconsin ICAC Task Force at the Department of Justice, Division of Criminal Investigations (DCI) for further follow-up. On July 27, 2024, DCI Criminal Analyst A. Crain reviewed the CyberTip and drafted an Administrative Subpoena, which was served on July 30, 2024 to T-Mobile regarding the internet protocol (IP) address named in the CyberTip. The response to the administrative subpoena was received on August 5, 2024 from T-Mobile identifying the subscriber as Michael S. Royal, the defendant herein. The subscriber address was on [REDACTED] in West Bend, and the service date start date was December 6, 2021.

Detective Edwards reports that through investigation, it was determined that the defendant currently resides at [REDACTED] in the Village of Kewaskum, Washington County, Wisconsin. Said officer reports that she and members of the Washington County Sheriff's Office conducted surveillance of the defendant's home and place of employment in the City of West Bend. She reports that she applied for and received a search warrant for the defendant's residence on Monday, September 23, 2024, at approximately 3:50 p.m. The search warrant was executed after a traffic stop was effected on the defendant on Wednesday, September 25, 2024, at approximately 5:15 a.m. Said officer reports the defendant was transported to the Washington County Sheriff's Office for an interview.

Detective Edwards reports that she and Detective T. L'Allier interviewed the defendant, who provided a post-*Miranda* statement. The defendant verified his identifying information, confirmed that T-Mobile is his cell phone provider, confirmed his residence at [REDACTED] in the Village of Kewaskum, and indicated that he had been living there since May 1, 2022. He also stated he had his current cellular phone for four to five years. The defendant described his technology savviness as a three out of a possible ten on a scale of one to ten with ten being very savvy. The defendant also stated, "I don't even know how to work that damn phone to be honest with you." The defendant then stated that applications that he uses are: Signal, WhatsApp, Discord, Kik, Instagram, Facebook, TikTok, Snapchat, and X (formerly Twitter). He also stated that "Someone told me you could get a reverse image search, and they put it on my phone for me." The defendant also denied using any file sharing stating that he did not know how to do that.

Detective Edwards reports that she showed the defendant a sanitized version of the image (recording) that was part of the CyberTip. The defendant denied having ever seen it before. The defendant stated that if there was CSAM on his phone, it was not him. He then stated that other people use his phone. Said officer reports that she was advised of and provided with a screenshot obtained from the defendant's phone. The defendant was shown part of the screenshot, where he admitted that he recognized the contact on the image as well as other thumbnail images visible in the screenshot. Said officer reports that at the bottom of the screenshot there were other thumbnails visible in the screenshot that appeared to depict nude children. The defendant denied that he had ever seen those in his phone before.

Detective Edwards reports that at the time of her report being completed, a partial extraction of the defendant's cell phone had been provided to her. She reports that the cell phone is a Samsung Galaxy S21+ 5G, and it was located in the defendant's pants pocket when he was detained. The following are a portion of the files located in the extraction:

**COUNT #1 \*FROM CYBERTIP #193858816\***

Filename: 1649f0f9-bc91-4809-b466-f7d13400964e.jpg

MD5: d505004f31f5e01269f86f5611a8d32d

IP Address Captured: 2607:fb90:d389:cf0a:51c5:7b0a:69ed:fa61 at 05-17-2024 08:11:31 UTC.

This recording depicts a screenshot on a cellular phone showing the time of 3:10, the user's alarm clock is set, and their battery was charged to 94%. The website that the original image is on is tr.xxxalt.ru. There is a prepubescent female child seen in the image that appears to be wet as if she just took a bath and is fully nude. The child is seen with her legs on each side of the bathtub, and she is holding herself up above the bathtub looking towards the camera while her vaginal area is exposed. The child is a Caucasian female with brown hair, blue eyes, and has her ears pierced. The child appears to be approximately 4-5 years of age.

**COUNT #2**

IMAGE NAME: 41.jfif

MD5: 8ec0620f786cc6119b85fbd543a70b05

FILE PATH: Detected Model\_SM-G996U.zip/sdcard/Download/41.jfif

MODIFIED: 6/28/2024 4:45:16 AM(UTC+0)

This recording depicts a very early pubescent female child who is fully nude and laying on her back. The child's breasts and vaginal area are exposed to the camera and the child is holding something pink to her vagina with her right hand.

**COUNT #3**

IMAGE NAME: LivestreamCP\_embedded\_1.jpg

MD5: 8472802d853f5451baaf8883abe41881

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_1.jpg

This recording depicts a prepubescent female child who is fully nude with her legs spread apart exposing her vaginal and anus areas to the camera while lifting her buttocks off of the ground and touching her pubic mound area with her left hand.

**COUNT #4**

IMAGE NAME: LivestreamCP\_embedded\_14.jpg

MD5: d52d856ca0982a64d047957ed3335f4f

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_14.jpg

This recording depicts a prepubescent female child who is fully nude but wearing socks. The child has her legs spread apart exposing her vaginal and anus areas to the camera while lifting her buttocks off of the ground.

**COUNT #5**

IMAGE NAME: LivestreamCP\_embedded\_15.jpg

MD5: 7bb2bc7ac9c82bdb71e904c8d0c4092a

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_15.jpg

This image depicts a prepubescent female child who is fully nude but wearing socks. The child has her legs spread apart exposing her vaginal and anus areas to the camera while lifting her buttocks off of the ground. The child is seen holding something small and black with her left hand close to the area of her clitoris.

**COUNT #6**

IMAGE NAME: LivestreamCP\_embedded\_16.jpg

MD5: 275ed9ce61c6e5697161a65f50a333a4

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_16.jpg

This recording depicts a prepubescent female child who is fully nude and laying back with her legs spread apart exposing her vaginal area to the camera. The child is seen with her hand balled up near her anus and looking at the camera with her mouth open.

**COUNT #7**

IMAGE NAME: LivestreamCP\_embedded\_18\_partial.jpg

MD5: 6854e1a519b357f4e0af93cffba4b0c2

FILE PATH: Detected Model\_SM-

G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_18\_partial.jpg

This recording depicts a prepubescent female child who is fully nude but wearing pink socks. The child has her legs spread apart exposing her vaginal and anus areas to the camera while lifting her buttocks off of the ground. The child is holding a pencil with her right hand and putting it in the area of her clitoris. The child is looking at the camera.

**COUNT #8**

IMAGE NAME: LivestreamCP\_embedded\_2.jpg

MD5: 88941ca515a5fbc3cb64c7a80b183ed2

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_2.jpg

This recording depicts a prepubescent female child who is fully nude. The child has her legs spread apart exposing her vaginal area to the camera while lifting her buttocks off of the ground. The child is holding what appears to be a lime green pen in her right hand putting the pen near her vaginal area, while looking at the camera.

**COUNT #9**

IMAGE NAME: LivestreamCP\_embedded\_4.jpg

MD5: eb6d17594673f719027ad335c9867cb0

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_4.jpg



This recording depicts a prepubescent female child who appears to not be wearing a shirt, and the child has what appears to be her pajama pants pulled down and is bent over on her knees exposing her vaginal and anus areas to the camera. The child is looking back at the camera and is seen inserting something green in color into her anus with her left hand.

**COUNT #10**

IMAGE NAME: LivestreamCP\_embedded\_5.jpg

MD5: 3dce2893b90b6319b5a249a9a54c530f

FILE PATH: Detected

Model\_SM-G996U.zip/sdcard/Download/LivestreamCP/LivestreamCP\_embedded\_5.jpg

This recording depicts a prepubescent female child who is fully nude, the child is seen with her legs spread apart exposing her vaginal and anus areas to the camera while lifting her buttocks off of the ground. The child is seen touching her vaginal area with her right hand.

Your complainant is further aware that additional recordings of child sexual abuse material were located on a tablet device located within the defendant's residence, and additional investigation is ongoing as the forensic analysis of the defendant's electronic devices continues.

Complainant also base his information upon review of the report of Detective L. Wilhelm, who reports that he was assisting in the search of the defendant's residence. He was advised that items were located and then seized by Investigator A. Meier. These items included a metal grinder with plant material and a glass pipe with residue. Detective Wilhelm reports that he conducted a field test on the plant material located in the grinder, and he received a positive indication for the presence of tetrahydrocannabinol. Your complainant is aware that grinders are utilized to prepare marijuana/THC for use in pipes or other smoking devices and are drug paraphernalia.

Based on the foregoing, the complainant believes this complaint to be true and correct.

**Subscribed and sworn to before me on 09/26/24**

**Electronically Signed By:**

**Mark D Bensen**

**District Attorney**

**State Bar #: 1000746**

**Electronically Signed By:**

**Det. Sgt. Donald Kapla**

**Complainant**