

**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Robert C ADAMS**

Age if under 'over 18' (if over 18 insert 'over 18) US Postal Inspector

This statement ( consisting of 3 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated:2<sup>nd</sup> October 2002

Signature: R.C.ADAMS

I am a United States Postal Inspector and have been so employed for- over twenty-six years. I am assigned to the Southwest Division in Fort Worth Texas. My duties include the investigation of the possession, distribution and receipt of child pornography through the United States mail and the Internet. I have received training on Child Pornography from the U.S.Postal Inspection Service, Federal Bureau of Investigation, U.S. Customs Service, The Center for Missing and Exploited Children and the Dallas TX Internet Crimes against Children Task Force.

In the United States, it is an offence for any person to possess or distribute images of children being subjected to sexual abuse.

In April 1999 I received some information concerning a website on the Internet named Landslide Productions Inc. The sole purpose of the company was to offer access to images of either adult pornography or children being subjected to sexual abuse. The owners of the web site home page were Thomas Kent REEDY date of birth 23<sup>rd</sup> January 1963 and Janice Lee REEDY date of birth 17<sup>th</sup> July 1968. Their home address was 6561 Lake Oak Circle, Fort Worth, Texas 76108 United States. They were married in December 1997 and have a daughter aged 10 years.

During 1997 and early 1998 the use of the Internet for the purpose of pornography increased. In response to the demand the REEDY's obtained more websites and became trusted and well established individuals in the world of pornography. This had become a full time business and the company was registered as Landslide Productions Inc. Towards the end of 1998 the REEDY's had moved Landslide Productions Inc. into Child Pornography. Almost immediately the company increased its financial turnover. They openly advertised the sale of access to Child Abuse Images and improved their company systems to cope with the massive increase of demand.

The United States Postal Inspection Service began its investigation and I was the Case Agent. As such I was responsible for overseeing the entire investigation and co-ordinating both the evidence and the prosecution.

On the 8<sup>th</sup> September 1999 the offices of Landslide Productions Inc. and the residence of Thomas and Janice REEDY were searched. I produce a copy of the search warrant as my exhibit RCA/1. All items relating to the company were seized including

- The database of transactions of thousands of individuals worldwide.
- The database that was accessed by the individual Webmasters and stored the
- Internet Protocol address (IP address) of the specific sites.
- The Financial computer, which used a computer database programme, called Quick Books.
- The computers used by the customer service representatives employed by Landslide Productions Inc. to attend to customer refunds and issues.
- The personal computers of Thomas and Janice REEDY's.

These items have been retained by the United States Postal Inspection Service.

On 17<sup>th</sup> May 2000 Thomas REEDY, Janice REEDY, Landslide Productions Inc. and five International Webmasters were indicted by a Federal Grand Jury in the Northern District of Texas. I produce the indictment as my exhibit RCA/2.

The five International Webmasters have yet to be located or detained as they all live in countries other than the United States.

On the 1<sup>st</sup> December 2000 Thomas REEDY, Janice REEDY, Landslide Productions Inc. were found guilty by a Federal Trial Jury. Thomas REEDY and Landslide Productions Inc. was convicted of 89 offences, Janice REEDY was convicted of 87 offences. All of these counts of the Federal Indictment related to possession and distribution of images of children being subjected to sexual abuse. I produce the Judgement as my exhibit RCA/3. On 6<sup>th</sup> August 2001 Thomas REEDY was sentenced to serve 180 months for each of the 89 counts to be served consecutively making a total of 1335 years imprisonment. Janice REEDY was sentenced to serve 168 months for each of the 87 counts to be served concurrently a total of 14 years imprisonment. Landslide Productions Inc. was ordered to pay a fine of \$6,950,970.

The total financial revenue received by Landslide Productions Inc. was estimated as \$9,275,900 for the period of September 1997 through to August 1999. Of this amount approximately 85% was attributable to the sale of web sites, which contained images of children being abused.

I have retained all the original documents.

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Michael MEAD**

Age if under 'over 18' (if over 18 insert 'over 18) US Postal Inspector

This statement ( consisting of 3 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated:2<sup>nd</sup> October 2002

Signature: R.C.ADAMS

I am a United States Postal Inspector and have been so employed for- over twenty-six years. I am assigned to the Southwest Division in Fort Worth Texas. My duties include the investigation of the possession, distribution and receipt of child pornography through the United States mail and the Internet. I have received training on Child Pornography from the U.S.Postal Inspection Service, Federal Bureau of Investigation, U.S. Customs Service, The Center for Missing and Exploited Children and the Dallas TX Internet Crimes against Children Task Force.

In the United States, it is an offence for any person to possess or distribute images of children being subjected to sexual abuse.

In April 1999 I received some information concerning a website on the Internet named Landslide Productions Inc. The sole purpose of the company was to offer access to images of either adult pornography or children being subjected to sexual abuse. The owners of the web site home page were Thomas Kent REEDY date of birth 23<sup>rd</sup> January 1963 and Janice Lee REEDY date of birth 17<sup>th</sup> July 1968. Their home address was 6561 Lake Oak Circle, Fort Worth, Texas 76108 United States. They were married in December 1997 and have a daughter aged 11 years.

During 1997 and early 1998 the use of the Internet for the purpose of pornography increased. In response to the demand the REEDY's obtained more websites and became trusted and well established individuals in the world of pornography. This had become a full time business and the company was registered as Landslide, Inc. Towards the end of 1998 the REEDY's had moved Landslide, Inc. into Child Pornography. Almost immediately the company increased its financial turnover. They openly advertised the sale of access to Child Abuse Images and improved their company systems to cope with the massive increase of demand. It is not known how the Webmasters of the Child Pornography websites identified themselves to Landslide, Inc. but it appears to be by word of mouth. The vast majority of the Webmasters are from Indonesia and appear to be either blood related or known associates.

This part of the business became known as 'KEYZ' and was site specific. This means that the customer purchased access to images of children being abused from one web site for a set period of time at a pre-determined cost. These sites were maintained manually and solely by the individual Webmaster on a separate system purchased by Thomas and Janice REEDY. This computer had built into it by them, a database which stored the Internet Protocol address (IP address) of the specific sites. The Webmasters and REEDY would change these IP addresses on a regular basis to avoid being traced by both Law Enforcement and competitors. This database is known as the Webmasters database. Thomas and Janice REEDY together with Thomas HUGHES purchased a Sun computer Server. The server's programs were manually created and designed to suit the purpose of Landslide, Inc. The object of the design was to automate the process as much as possible. It was regularly re-configured to improve its capabilities with new scripts and computer code written by-both Thomas REEDY and Thomas HUGHES to achieve this. This database is known as the customer database.

During the course of our investigation an undercover operation was carried out by Dallas, Texas Police Detective Steve Nelson, who established by purchasing access to websites via the Landslide, Inc homepage, that Child Pornography sites were being offered by Landslide, Inc., all of the web sites purchased were found to contain predominately paedophilic images. Detective Nelson purchased and documented twelve websites, all of which were found to contain paedophilic images. He purchased access to the sites named 'Blackcat', 'Childgod', 'Childplay', 'Childrape', 'Forchild', 'Funky', 'Growup', 'Innoc', 'Lolihard', 'Loll', 'Nympho', 'Think'. During our time on these sites we downloaded images of child abuse. I have supplied WDC Sharon Girling of the National Crime Squad in the United Kingdom with a compact disk of eleven of the web sites and images captured. I produce that compact disk as my exhibit MM/4. I have supplied WDC Sharon Girling of the National Crime Squad in the United Kingdom with a video tape of the 'Innoc' web site and images recorded. I produce the video tape as my exhibit MM/12.

The following details are provided to explain the process for viewing the web sites and images accessed through Landslide, Inc:

- a) The web site could not be reached by chance. The user would need to physically type the URL, [www.landslide.com](http://www.landslide.com) or [www.keyz.com](http://www.keyz.com). Alternatively you could be redirected to it from another website or by a keyword search from an Internet Search engine.
- b) Webmasters who utilised Landslide, Inc. for collection of money for web site access were offered two options. These are described as follows:
  - The AVS (adult content) side of Landslide, Inc. provided access to a large collection of web sites for a single signup fee. Once the customer paid, they were allowed access to over a thousand web sites. An index of available sites included hyperlinks to these websites for all-members. A review of web sites offered on the AVS service revealed predominately adult pornography.
  - The KEYZ (predominately Child Pornography) side of Landslide, Inc., was site specific and allowed access to only one website for each paid subscription. There was no index of the sites available for customers to

review. Upon initial entry to the Landslide home page, a banner hyperlink was depicted which included the words 'Click Here Child Porn'. The Words Enter or Exit in bold letters and underlined were displayed below this banner hyperlink. The user needed to select manually, whether to Enter this, site at this stage. I produce a copy of this screen as my exhibit MM/1. When a visitor to the home page clicked on this banner hyperlink, they were redirected to a web page containing other banner hyperlinks, which can be described as an advertisement to the material available on the particular site. Banners present on the KEYZ associated web site, advertised children being subjected to abuse. In many instances these banners showed three, four or five thumbnail pictures of the material that was available. During the time that we monitored the website, the banners did not alter in any way. I produce a copy of the screen showing the 'childrape' website as my exhibit MM/2 and a copy of other captured screens as exhibit MM/3

- c) Prior to accessing the images contained in these pages, a customer was required to provide personal details and financial information to Landslide, Inc. This included their name, home address, e-mail address, a password, credit card number, type of credit card i.e. Visa, MasterCard or American Express, and the month and year of expiration of that credit card. The potential customer manually input these details on a registration/sign-up page. I produce a copy of this registration/sign-up as my exhibit M M/6.
- d) The Webmasters selected the period of time and cost that they allowed access to their material. The duration of access could be 24 hours, 7 days, 14 days, 30 days, 60 days or 90 days. The cost as predetermined by the Webmaster was \$5, \$9.95, \$14.95, \$19.95, \$24.95 or \$29.95. The Webmaster could select any combination of cost and duration for access to their web sites. The Webmaster who owned the images could alter these selections at any time.
- e) When a customer subscribed to a web site, accessible through Landslide, preliminary credit card verification was completed. This process was completed within a very short time period and if successful, an automated e-mail was sent to the e-mail address supplied by the customer. For complete verification of personal data and collection of the applicable credit card charges, Landslide, Inc. employed a credit card processing service and merchant company who checked the accuracy of the supplied data. This included any lost or stolen reports or allegations of fraud on the credit cards. This company also checked that the supplied address details matched the billing address of the credit card.
- f) The e-mail verification message of subscription included a unique user id, which allowed access to the relevant web site. If an individual attempted access to additional KEYZ web sites, the same verification process was necessary.
- g) When a current customer signed into a KEYZ web site, the unique user id and password were typed into the appropriate area of the membership screen. This information was redirected to a database of current members, which was

maintained on the computers owned and operated by Landslide, Inc. If the user id and password matched and were recognised for a current customer then access was gained to images of children being subjected to abuse.

- h) At the conclusion of the paid period the account expired and access to the images of children being subjected to abuse was no longer possible. To renew access to the desired website, the initial registration was completed again, and an additional payment was made.

On the Landslide, Inc. home page was a hyperlink to the customer guidelines. I produce this document as my exhibit MM/7.

On the 8th September 1999 the offices of Landslide, Inc. and the residence of Thomas and Janice REEDY were searched. All items relating to the company were seized including

- The database of transactions of thousands of individuals worldwide.
- The database that was accessed by the individual Webmasters and stored the Internet Protocol address (IP address) of the specific sites.
- The computer which contained the Financial database programme called Quick Books.
- The computers used by the customer service representatives employed by Landslide, Inc. to attend to customer refunds and issues.
- The personal computers of Thomas and Janice REEDY.

All of these items are retained by the United States Postal Inspection Service, and I have sole access and control of the equipment and data.

I have examined the customer database and analysed the data and can state that there are 26,462 transactions relating to individuals in the United Kingdom. This number would include any person who had completed or attempted to complete registration to one of web sites accessed through Landslide, Inc., including the adult pornography sites.

There are twenty-one columns on the original database. Below is a description of each of those columns:

- 1) User. This-is the unique user id allocated to the customer by the REEDY's after authorisation by Landslide, Inc. This unique id was required for subsequent access to the images.
- 2) Name. This is the name as entered by the customer at registration and in the majority of cases matched the name on the credit card.
- 3) Password. The user selected their password and when matched to the unique user id permitted access to the purchased web site. Any correspondance with

Landslide, Inc. required the inclusion of both the user id and password.

- 4) Address. This is the house title or number and the street name.
- 5) City. This is the town or village that the account holder lived.
- 6) State. This is the county that the address where the account holder lived.
- 7) Country. This is the country where the account holder lived.
- 8) Zip code. This is the postcode of relating to the address.
- 9) E-mail. This is the electronic address for the customer to receive correspondence from Landslide, Inc. The unique user id was e-mailed to this electronic address.
- 10) cc\_num. Credit card number as supplied by the customer.
- 11) cc\_type. Credit Card type as supplied by the customer. Visa, MasterCard or American Express were acceptable to Landslide, Inc.
- 12) cc\_expm. Expiration month of the credit card as supplied by the customer.
- 13) cc\_expy. Expiration year of the credit card as supplied by the customer.
- 14) Time. This entry was automatically entered by the internal clock of the UNIX operating system utilized by Landslide, Inc. The entry reflects the amount of seconds since midnight on 1st January 1970. When translated this time entry reflects the date the customer's account expired or was disabled.
- 15) Code. This column identified registration information relevant to web sites access. The following codes reflected successful transactions:
  - xxxx = This means a good subscription sign-up.
  - RENEW = The initial subscription was automatically renewed. This was only in the early stages of Landslide, Inc., when the accounts were automatically renewed upon expiration.
  - The following codes reflected unsuccessful transactions:
  - Bad#, Insane, Time out, Card expired, Sorry BA, Sorry DC, Sorry DA, Sorry DP, Call unavailable, Call centre unavailable, Call centre not supported, Declined, Invalid, and Address wrong.
- 16) Status. This column reflected the current status of the account. It displayed a single letter which was either
  - E = Valid account where the subscription time period had expired.

- B = The information entered by the customer was not verifiable for many different reasons
  - D = In the initial set-up of Landslide, Inc. the subscriptions were automatically renewed. Due to the complaints received from customers these accounts were disabled and money refunded.
  - N = These were duplicated account subscription and other instances for which the customer was not charged.
  - L = This indicated a good and proper sign up to an AVS (adult pornography) site.
  - G = This indicated a good and proper sign up to an Keyz (child pornography) site.
- 17) Referrer paid. This column was originally deigned to designate payment to the appropriate AVS Webmaster, but was not maintained by Landslide, Inc.
- 18) F\_Gold. This column was applicable to the AVS side of Landslide, Inc. but was not maintained.
- 19) Class. This column contained letter designations. The lettered code translated into the cost and duration of access. A chart which defines and explains these letters is known as Landslide ORates. Class designations beginning with a, b, c, and m through x refer to the AVS service which is predominately Adult Pornography web sites. All other class designations refer to the Keyz service that was established to be predominantly Child Pornographic web sites. I produce a copy of the Landslide ORates as exhibit MM/8.
- 20) Referrer. This column contained an abbreviated name of the website to which the customer subscribed. The abbtivated name was selected by the Webmaster when they subscribed to the services of Landslide, Inc. A chart associating this abbreviated name and the descriptive website name is produced by me as exhibit MM/9. A compact disk showing these names and the Internet Protocol addresses of these sites is produced as exhibit MM/10.
- 21) Class\_go. This column was initially utilised to track unsuccessful subscription attempts, but was not maintained by Landslide, Inc.

I facilitated WDC Sharon Girling to be supplied the database of United Kingdom transactions on a compact disk. I produce a copy of that data as my exhibit MM/5.

From my examination of the Webmasters database I can tell that it was accessed manually and solely by Thomas REEDY and the other individual Webmasters who owned the particular websites. This database had built into it by Landsside, Inc., a system that stored the Internet Protocol address (IP address) of the specific sites. The Webmasters or REEDY would change

these IP addresses on a regular basis to avoid being traced by both Law Enforcement and competitors.

Janice REEDY was responsible for the finances of Landslide Inc. She operated a financial computer that used a computer database programme called 'Quickbooks'. Each month she would access the Customer database and print a hard copy of the month's transactions.

These entries were then manually typed into the appropriate accounts of the individual Webmasters on the financial computer. This would show how much each Webmaster should receive from Landslide, Inc. and Janice Reedy would then transmit a wire transfer of the amount calculated for each account. For all wire transfers, the webmaster supplied banking information for receipt of the funds. This process was conducted manually. Landslide, Inc. policy was to refund monies to any person who requested, regardless of the reason. They would rather lose an individual client than incur the cost of a chargeback. To this end they employed three individuals David CRUZ, Janet BALDWIN and Dan VAN HUSS who were known as Customer Service Representatives. David CRUZ was additionally

designated as the Webmaster contact individual for Landslide, Inc. It was their responsibility to ensure that the customers and Webmasters were satisfied with the service that they received. They entered the customer database on a regular basis and manually entered refund information for those people who complained. Refunds were requested because of the unavailability of the particular website to which they had purchased access or merely after 29 days of a 30 day subscription period. The representative responsible for conducting the refund would manually type in the customer database that a refund or chargeback had been given and that entry was routinely dated and initialled. This documentation was annotated through separate machines connected to the Landslide, Inc. servers, and identified as Customer Service computers.

Landslide, Inc. used the services of a credit card processing centre to complete the financial transactions and collect funds charged. The processing centres used were Lancelot and then Superior Credit Card Processing. The latter wrote to Landslide, Inc. on 9th August 1999 advising them that they would be withdrawing their processing services due to excessive chargeback activity. This letter was signed by Steve CHAPPELL the Operations Manager C and faxed to Landslide, Inc. on 10th August 1999. I produce a copy of this letter as my exhibit MM/11. Following my examination of the Landslide, Inc. network I can state that no entries were created on the system since approximately 24th August 1999. From the bank accounts I can see that the company received no payments since 15th August 1999. From my enquiries I believe that Landslide, Inc. was negotiating the use of a different Credit Card Processing company to complete the financial transactions. During this time, access was given to any person completing the registration document and no charge was made to that individuals credit card. It is believed that these individuals would be charged once the new credit card processing company had been selected.

On 17th May 2000 Thomas REEDY, Janice REEDY, Landslide, Inc. and five International Webmasters were indicted by a Federal Grand Jury in the Northern District of Texas. The five International Webmasters have yet to be located or detained as they all live in countries other than the United States.

On the 1st December 2000 Thomas REEDY, Janice REEDY, Landslide, Inc. were found guilty

by a Federal Trial Jury. Thomas REEDY and Landslide, Inc. was convicted of 89 offences, Janice REEDY was convicted of 87 offences. All of these counts of the Federal Indictment related to possession and distribution of images of children being subjected to sexual abuse.

On 6th August 2001 Thomas REEDY was sentenced to to serve 180 months for each of the 89 counts to be served consecutively, making a total of 1335 years imprisonment. Janice REEDY was sentenced to serve 168 months for each of the 87 counts to be served concurrently, a total of 14 years imprisonment. Landslide, Inc. was ordered to pay a fine of \$6,950,970.

The total financial revenue received by Landslide, Inc. was estimated as \$9,275,900 for the period of September 1997 through to August 1999. Of this amount approximately 85% was attributable to the sale of web sites, which contained images of children being abused.

On 2nd October 2002 WDC Sharon Girling of the National Crime Squad, United Kingdom visited our offices. I supplied the National Crime Squad with the following items which they examined and aquired an image of in my presence.

1. A Seagate hard drive (marked top) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/001** Image of A00843012 - Seal 649592.
2. A Seagate hard drive (marked bottom) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/002** Image of A00843012 - Seal 649593.
3. A Seagate hard drive from computer marked A00843011 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/003** Image of A00843011 - Seal 649594.
4. A Seagate hard drive (marked top) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/004** Image of A00003162 - Seal 649595.
5. A Seagate hard drive (marked bottom) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/005** Image of A00003162 - Seal 649596.
6. A Toshiba hard drive from computer marked A00003165 which was secured onto DVD Disk and sealed in bags marked as:  
**NCS/006** Image of A00003165 - Seal 649597.
7. A IBM hard drive from computer marked A00003167 which was secured onto DVD Disk and sealed in bags marked as:

**NCS1007** Image of A00003167 - Seal 649598.

8. A Fujitsu hard drive (marked front) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/008** Image of A00843069 - Seal 649599.

9. A Fujitsu hard drive (marked back) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/009** Image of A00843069 - Seal 649600.

10. A 'clone' hard drive from computer marked A00843010 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/010** Image of A00843010 - Seal 649601.

11. A Conner hard drive from computer marked A00843068 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/011** Image of A00843068 - Seal 649602.

12. The original Hard Disk those Image copies were stored on was then sealed in a bag marked as:

**NCS/012** Maxtor Hard Disk - Seal 649603.

As a result of our investigation, it is my opinion that individuals were not able to access or download images from the KEYZ web sites without intentionally registering their financial information with Landslide, Inc. The KEYZ web sites, which were reviewed and documented contained explicit banner images and language describing their content. The filing of financial information with Landslide, Inc. implies an informed and intentional attempt by customers to obtain the desired web sites.

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Steven A.Nelson**

Age if under 'over 18' (if over 18 insert 'over 18) Police Officer

This statement ( consisting of 3 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 3rd October 2002

Signature:

I am a Police Officer working with Child Exploitation/Internet Crimes Against Children Squad in the.Dallas Police Department, State of Texas, United States of America.

I am a member of the Crimes Against Children Task Force attached to the Federal Bureau of Investigation (FBI) and the Internet Crimes Against Children Task Force. I am a special deputy US Marshal.

I have assisted the FBI, the US Postal Inspection Service, and the US Customs Agency in the investigation of cases involving child exploitation and child pornography. I have been designated as an expert witness in the field of child exploitation and child pornography in the state of Texas and other states throughout the United States and abroad.

I have over 600 hours of seminar work involving child pornography offences and have assisted other law enforcement agencies in the investigation of these crimes. I have investigated over 2500 cases of child exploitation and over 700 cases of child pornography. I am a certified instructor in the State of Texas with expertise in these fields.

On 22nd April 1999, I received information from Robert ADAMS a US Postal inspector from Texas that a web site known as [www.keyz.com](http://www.keyz.com) was operating out of the state of Texas. The web site was allegedly displaying child pornography for sale. As a result of this information I was assigned to investigate the matter.

Between 28th April 1999, and 8th September 1999, I worked in conjunction with the Dallas Police Department Youth and Family Support Division and the Child ExploitationMnternet Crimes Against Children Squad and the United States Postal Inspection Service. I entered into and conducted a lengthy investigation with the purpose of securing admissible evidence for prosecution.

The investigation revealed that the [www.keyz.com](http://www.keyz.com) web site was owned and operated as part of a business identified as Landslide Incorporated (hereinafter known as Landslide Inc.). We also

learned that Landslide Inc., located at 1124 Seaman Street, Fort Worth, Texas, was owned and operated by Thomas and Janice Reedy of Fort Worth, Texas. Landslide Inc. did not actually host the child pornography web sites. It only offered access to the child pornography web sites through [www.keyz.com](http://www.keyz.com), which in turn acted as an electronic gateway to the various child pornography websites. Access for viewing and downloading by the client was achieved by KEYZ.COM receiving and processing its clients' purchase applications and subsequently receiving credit card verification for the transactions via a banking service. In short, Landslide Inc. was acting as a brokerage business for hundreds of child pornography web sites along with other adult pornography web sites. Landslide Inc. posted its own web page on the Internet known as [Landslide.com](http://Landslide.com). In addition to the KEYZ.COM web site, Landslide Inc. via its home page [Landslide.com](http://Landslide.com) also made available three other web sites, which were accessible by links from the [Landslide.com](http://Landslide.com) home page. They were named AVS.COM, BADCARD.COM and LOOKING.NET. During the course of my investigation I was able to access the AVS.COM web site. I discovered that it was predominately an adult oriented pornography site offering explicit sexual material. Clients paid one fee of US \$19.95 to access, view and download the images for a one year period. It did not contain child pornography. I was also able to access the KEYZ.COM web site and discovered that it contained access to child pornography. I was not able to access BADCARD.COM and LOOKING.NET as they were under construction and not available at the time of investigation.

[Landslide.com](http://Landslide.com) home page allowed access to a web page at, <http://www.Landslide.com/houdini/classifieds.html>. On the home page of [Landslide.com](http://Landslide.com) was a banner advertising "CLICK HERE CHILD PORN". I produce a copy of this webpage as my exhibit SAN/1

Also on the homepage of [Landslide.com](http://Landslide.com) was a link "adult classifieds". This "CLICK HERE CHILD PORN" banner was also advertised on this adult classifieds page. That web page contained adult classified advertisements from individuals asking to trade, buy, and produce child pornography. It also advertised persons looking for actual children for sex. When I activated the banner "CLICK HERE CHILD PORN" by clicking directly on it I was taken to another web page containing the following statements: "I WARN YOU", "YOU'RE ABOUT ENTERING THE MOST CONTROVERSIAL SITE ON THE WEB!". "In the following pages you will find adult explicit pictures! No legal content! Phedophilias! All sick, all sex maniacs!". "We're frequently banned everywhere so if you found us here, you're really a lucky one!!! G\*D Bless Thee!". "DON'T WASTE YOUR TIME ANYMORE". "CLICK HERE TO ENTER LOLITA WORLD". I produce a copy of this webpage as my exhibit SAN/2.

I then clicked on the banner, "CLICK HERE TO ENTER LOLITA WORLD". I was taken to the Lolita World web page which proclaimed itself as "the most controversial website!" This web page contained a variety of images and banners which were previews and advertisements for various types of child pornography. Each image preview had associated to it a number of links available to the client. Each preview image advertised hundreds of available files all related to child pornography. One image advertised over 1000 files of child pornography from ages 5 to 16. Other preview images each advertised hundreds of files of child pornography varying in ages from ages-5 to 18. I produce a copy of the webpages that I have stored as my exhibit SAN/3.

I scrolled down the page. Near the bottom of the Lolita World web page was a banner that read, "Get your password now!". I clicked on that banner and was taken to another web page. That

page contained a picture of a nude child and further warnings. At the bottom of that page was an advertisement for KEYZ. that also depicted an image of child pornography (oral sex). I subsequently clicked on a link stating "Get your password now!". That brought me to another page, which was an application order form for "Lolita World" showing a cost of US \$29.95 for 30 days only. The bottom of the application form stated, "When you sign up for a KEYZ account your credit card will be charged by Landslide Inc. The address you enter must match the billing address of your credit card". I produce a copy of that registration page as my exhibit SAN/4.

In order to access the site and further my investigation I completed the form, providing my "undercover" name, address, credit card number, and created a password. I also provided an e-mail address. This was submitted for processing and credit card verification. While my application was being processed, I was instructed to wait for a confirmation e-mail with a unique user id. Within a few minutes I received a confirmation e-mail from KEYZ.COM at my e-mail address which provided me with a unique user id. Aan accompanying instruction also told me that I had a specific number of days (in this case 30 days) to access the web site "Lolita World". Furthermore, I was instructed to return to KEYZ.COM.

I returned to the KEYZ.COM web site and filled in the unique user id which had been given to me from the KEYZ.COM confirmation e-mail. I also filled in my password I had created on my application. At that time I was taken to the web page for the Lolita World web site I had purchased. I was then given access to that site and child abuse images were made available to me for viewing and downloading.

During the course of my investigation, I attempted to gain access to some of the other sites contained on the Lolita World web page by clicking on some of the associated links. It was necessary to determine the extent and type of child abuse images being depicted and confirm to what extent KEYZ.COM operated. I discovered that any attempt to access any one of the other child pornography web sites (Erotic Innocence Angels for example) was denied. I was immediately returned to KEYZ.COM. Access to any one of the other advertised child pornography web sites could not be made without a separate and distinct purchase being made through KEYZ.COM following the same application and credit card approval process outlined in the previous four paragraphs.

Following the same procedure, as instructed by KEYZ.COM, I was able to purchase access to 10 different web pages randomly selected from the KEYZ.COM Internet site. They were:

- Just Grow Up
- Children's Playground
- Child Rape
- Lolita Hardcore
- Lolita World
- Black Cat Lolita Photo Series

- Fantastic Site
- Lolitas Land
- Special Site
- Innocent Lolita

All of these sites contained child abuse images.

I was also able to access two other sites containing child abuse images named

- Children Forced to Porn
- Children of God

This was achieved by obtaining passwords from other clients through the exchange of e-mails via the Landslide.com/houdini/classifieds advertisement web page described earlier. By the use of specialized computer software I was able to capture and download the complete web sites that I had purchased via KEYZ.COM. I produce a compact disk of the websites that I captured as my exhibit SAN/5.

In addition to the 12 random child pornography web sites already accessed through KEYZ.COM, I was able to view 16 other teaser pages depicting images of child abuse images from the other 12 sites by clicking on the applicable banner. All of the 16 sites contained explicit child abuse images. These 16 sites were available to the public on the Internet via other banners. Any attempt to access the site automatically resulted in being directed back to KEYZ.COM to complete the application for purchase and credit card verification process. Only then were the child pornography web sites and images made available for viewing and downloading by clients.

All 28 web pages I was able to access via KEYZ.COM contained child abuse images. KEYZ.COM, however, did not contain or offer child pornography of its own. It was strictly the gateway to a variety of servers for the hundreds of other child pornographic web sites.

We believed that all of the material available to the public via KEYZ.COM was in violation of Title 18, United States Code, Sections 2252, 2252A and 2. The definition of child pornography is:

The visual depiction of a minor person engaging in sexually explicit conduct. A minor means any person under the age of 18 years. Sexually explicit conduct includes sexual intercourse, including genital-genital, oral-genital, anal-genital, anal-anal or oral-anal, whether between persons of the same or opposite sex, bestiality, masturbation, sadistic or masochistic abuse or lascivious exhibition of the genitals or pubic area of any person.

On 8th September 1999, myself and the investigative team of the United States Postal Inspection Service, FBI, United States Customs Service and the Tarrant County Sheriffs Office, executed a Search Warrant on the business premises of Landslide Inc., in Fort Worth, Texas. A Search Warrant was also executed at the residence of the registered owners of Landslide Inc., Thomas

Reedy and Janice Reedy.

As a result of the search conducted at the business premise of Landslide Inc., numerous computer systems and computer servers were seized. A forensic examination of the servers seized from Landslide Inc. disclosed a database for www. keys.com, containing a list of clients who had purchased access to specific child pornography sites from Landslide Inc. The database contained all of the recorded information from the on-line application form, which had been completed and submitted by the customer. That information included the name of the customer, the password used to enter a web site, the number and street name of residence, city, state or province of residence, postal or zip code, country, e-mail, credit card number, type of credit card, month of expiry for the credit card and the year of expiry for the credit card.

Further examination of the www.keyz.com database, which was generated by Landslide Inc., revealed a variety of codes. The meaning of the codes was unknown. Upon recovery of the client data base from the server, I compared the purchases that I had made via KEYZ.COM to the coding that was revealed by the client list. I was able to decipher the meaning of the codes because the codes were consistent with the nature of each purchase that I had made. The codes were discovered to relate to the name of the specific child pornographic and adult web site purchased, the amount of payment, duration of access, successfully billed credit card transactions as well as other aspects of the transactions that had been made.

The data recovery, made as a result of the forensic examination, also revealed E-mails of complaint (sic) made from clients directly to Landslide.com. The complaints cited the client's displeasure in regards to the quality of images at some of the requested child pornography sites. Complaints also indicated that some of the sites contained duplicate images observed at other sites. Clients had requested refunds directly from Landslide.com. Rather than provide refunds to the clients, Landslide.com, in reply, directed the clients to a site called PUSSIES 4 U. LandSlide.com owned this site and it could only be accessed through KEYZ.COM. Examination of the PUSSIES 4 U site revealed that it contained a wide variety of prohibited pornography including child pornography, bestiality, violent and dehumanizing sexual scenes etc.

On 1Sc December 2000, Thomas Reedy was convicted by jury in the State of Texas of 89 counts in relation to the Federal Grand Jury Indictment under Title 18, United States Code, Section 2252 (Sexual Exploitation of Children). Janice Reedy was convicted of 87 counts under the same indictment. Landslide Inc., was also convicted of 89 counts under the same indictment.

As a result of our investigation, it is my opinion that individuals were not able to access or download images from the these web sites without intentionally registering their financial information with Landslide Productions Inc. The web sites, which were reviewed and documented contained explicit banner images and language describing their content. The filing of financial information with Landslide Productions Inc. implies an informed and intentional attempt by customers to obtain images of children being abused.

All of the exhibits have been handed to WDC Sharon GIRLING of the National Crime Squad.

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Nicholas A.WEBBER**

Age if under 'over 18' (if over 18 insert 'over 18') Computer Consultant

This statement ( consisting of 3 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 4th October 2002

Signature:

On 2nd October 2002 together with WDC Sharon Girling of the National Crime Squad, United Kingdom I visited the offices of the US Postal Inspection Service in Fort Worth, Texas. Inspector Michael MEAD gave us access to the computers, which had been seized and controlled by him, in relation to the Landslide Investigation. During the next three days I examined and aquired an image of the following items.

1. A Seagate hard drive (marked top) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/001** Image of A00843012 - Seal 649592.

2. A Seagate hard drive (marked bottom) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/002** Image of A00843012 - Seal 649593.

3. A Seagate hard drive from computer marked A00843011 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/003** Image of A00843011 - Seal 649594.

4. A Seagate hard drive (marked top) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/004** Image of A00003162 - Seal 649595.

5. A Seagate hard drive (marked bottom) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/005** Image of A00003162 - Seal 649596.

6. A Toshiba hard drive from computer marked A00003165 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/006** Image of A00003165 - Seal 649597.

7. A IBM hard drive from computer marked A00003167 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/007** Image of A00003167 - Seal 649598.

8. A Fujitsu hard drive (marked front) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/008** Image of A00843069 - Seal 649599.

9. A Fujitsu hard drive (marked back) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/009** Image of A00843069 - Seal 649600.

10. A 'clone' hard drive from computer marked A00843010 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/010** Image of A0084301 0 - Seal 649601.

11. A Conner hard drive from computer marked A00843068 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/011** Image of A00843068 - Seal 649602.

12. The original Hard Disk thjose Image copies were stored on was then sealed in a bag marked as:

**NCS/012** Maxtor Hard Disk - Seal 649603.

On 4th October 2002 all of the sealed bags were handed to WDC Sharon GIRLING.

**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

Statement of Brian E.UNDERHILL

Age if under 'over 18' (if over 18 insert 'over 18') Computer Consultant

This statement ( consisting of: 2 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 4th October 2002

Signature:

On 2nd October 2002 together with WDC Sharon Girling of the National Crime Squad, United Kingdom I visited the offices of the US Postal Inspection Service in Fort Worth, Texas. Inspector Michael MEAD gave us access to the computers, which had been seized and controlled by him, in relation to the Landslide Investigation. During the next three days I examined and aquired an image of the following items.

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**NCS/002** Image of A00843012 - Seal 649593.

3. A Seagate hard drive from computer marked A00843011 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/003** Image of A00843011 - Seal 649594.

4. A Seagate hard drive (marked top) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/004** Image of A00003162 - Seal 649595.

5. A Seagate hard drive (marked bottom) from computer marked A00003162 which was

secured onto DVD Disk and sealed in bags marked as:

**NCS/005** Image of A00003162 - Seal 649596.

6. A Toshiba hard drive from computer marked A00003165 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/006** Image of A00003165 - Seal 649597.

7. A IBM hard drive from computer marked A00003167 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/007** Image of A00003167 - Seal 649598.

8. A Fujitsu hard drive (marked front) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/008** Image of A00843069 - Seal 649599.

9. A Fujitsu hard drive (marked back) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/009** Image of A00843069 - Seal 649600.

10. A 'clone' hard drive from computer marked A00843010 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/010** Image of A0084301 0 - Seal 649601.

11. A Conner hard drive from computer marked A00843068 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/011** Image of A00843068 - Seal 649602.

12. The original Hard Disk thjose Image copies were stored on was then sealed in a bag marked as:

**NCS/012** Maxtor Hard Disk - Seal 649603.

On 4th October 2002 all of the sealed bags were handed to WDC Sharon GIRLING.

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Sharon GIRLING**

Age if under 18 'over 18' (if over 18 insert 'over 18') Occupation Police Officer

This statement ( consisting of 10 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 29<sup>th</sup> January 2003

Signature: Sharon GIRLING

I am a Police Officer involved in computer investigations on the Internet and have been so for four years. I am the case officer in the United Kingdom for an investigation into the activity of United States Company known as either Landslide Productions Inc. or Landslide Inc. as it later became known. From the enquiries that I have undertaken and the documents that I have viewed I have prepared this statement in relation to the production and continuity of exhibits.

In April 2002 I received data from the National Criminal Intelligence Service relating to transactions by persons residing in the United Kingdom from a website initially known as Landslide Productions Inc. and subsequently as Landslide Inc.

I received a full copy of this database direct from the United States Postal Inspection Service, Inspector Michael MEAD, in the form of a compact disc, which I produce as exhibit SAG/ 10.

I also received another disc of related data from the United States Postal Inspector Michael MEAD, which I produce as exhibit SAG/9. The disc SAG/9 contained data, which I analysed and from it created the following documents -

- 1) Transaction charts for individual persons, which I produce as exhibit SAG/1.
- 2) A sample of images available on twelve selected websites, which I produce as exhibit SAG/4
- 3) A sample of the website sign up/registration page which I produce as exhibit SAG/5.
- 4) A sample of the website customer guidelines which I produce as exhibit SAG/6. 5) The 'Child Porn' front page, which I produce as exhibit SAG/11.
- 6) The banner of the web page named 'Child Rape' which I produce as exhibit SAG/12. 7) A selection of other banners, which I produce as exhibit SAG/13.

Between 2nd October 2002 and 4th October 2002 I visited the offices of the Postal Inspection Service in Fort Worth Texas. During my time there I facilitated the examination and imaging of all the computer data relating to the Postal Inspection Service investigation of Landslide Inc. This examination and imaging was completed in my presence and under my control by Nicholas WEBBER and Brian UNDERHILL. I sealed the hard drives and DVD disks in the below listed manner.

1. A Seagate hard drive (marked top) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/001** Image of A00843012 - Seal 649592.

2. A Seagate hard drive (marked bottom) from computer marked A00843012 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/002** Image of A00843012 - Seal 649593.

3. A Seagate hard drive from computer marked A00843011 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/003** Image of A00843011 - Seal 649594.

4. A Seagate hard drive (marked top) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/004** Image of A00003162 - Seal 649595.

5. A Seagate hard drive (marked bottom) from computer marked A00003162 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/005** Image of A00003162 - Seal 649596.

6. A Toshiba hard drive from computer marked A00003165 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/006** Image of A00003165 - Seal 649597.

7. A IBM hard drive from computer marked A00003167 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/007** Image of A00003167 - Seal 649598.

8. A Fujitsu hard drive (marked front) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/008** Image of A00843069 - Seal 649599.

9. A Fujitsu hard drive (marked back) from computer marked A00843069 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/009** Image of A00843069 - Seal 649600.

10. A 'clone' hard drive from computer marked A00843010 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/010** Image of A0084301 0 - Seal 649601.

11. A Conner hard drive from computer marked A00843068 which was secured onto DVD Disk and sealed in bags marked as:

**NCS/011** Image of A00843068 - Seal 649602.

12. The original Hard Disk thjose Image copies were stored on was then sealed in a bag marked as:

**NCS/012** Maxtor Hard Disk - Seal 649603.

These items were then packed in a Postal Inspection bag and sealed by me using unique tag number 36501895. I then packed and sealed these items in a secure package and placed them in the exhibits store within the United States Postal Inspection Office.

At this time I interviewed Detective Steven NELSON, Postal Inspector Robert ADAMS and Postal Inspector Michael MEAD, and took their written statements. I received from them the original exhibits as listed. The exhibits collected from Police Officer Steven NELSON are recorded as: -

- 1) The front screen 'Child Porn Click Here' SAN/1
- 2) A copy of follow up web page SAN/2
- 3) Various website banners SAN/3
- 4) The website sign up/ registration page SAN/4
- 5) Compact disk of captured websites SAN/5

The exhibits collected from Postal Inspector Robert ADAMS are recorded as: -.

- 1) The search warrants relating to, the home address of Thomas REEDY and Janice REEDY and the business premises of Landslide Inc. RCA/1
- 2) The Indictment relating to Thomas REEDY, Janice REEDY and Landslide Inc. RCA/2 3) The Judgement relating to Thomas REEDY, Janice REEDY and Landslide Inc. RCA/3

The exhibits from Postal Inspector Michael MEAD are recorded as:-

1) The front screen 'Child Porn Click Here'	MM/1	
2) The 'Child Rape' website	MM/2	
3) The banners from various websites	MM/3	
4) Images captured from twelve websites	MM/4	
5) A compact disc of data relating to the transactions of Landslide Inc.	MM/5	
6) The website sign up/registration page	MM/6	
7) The customer guidelines	MM/7	
8) Landslide Orates chart	MM/8	
9) The website abbreviated names	MM/9	
10) A compact disc of the website abbreviated names and IP addresses	MM/10	
11) Letter from Superior Bank	MM/11	
12) A video tape of the 'Innoc' website	MM/12	

These exhibits were handed to me and I sealed them in a secure bag number 36501897 and stored that bag in the exhibits store at the US Postal Inspection Service offices. Between the 2nd December 2002 and the 5th December 2002 I re-visited the offices of the United States Postal Inspection Service in Fort Worth, Texas. I was given access and control of all the documents, which were either seized from the offices of Landslide Inc, the home address of Thomas and Janice REEDY or were prepared by the prosecution and formed part of the court proceedings relating to trial of Landslide Inc. and the REEDY's. These documents were in batch files and each batch file had a unique reference number identifying the location where they had been seized.

Each document was examined and the ones considered relevant to prosecutions in the United Kingdom were copied. The original was re-stored in its original batch file and returned to the United States Postal Inspection Service. Each copied document was placed in a secure package and given a unique exhibits number. These secure packages along with the earlier prepared packages in United States Postal Inspection Service bag number 36501895 and bag number 36501897 were conveyed back to the United Kingdom under my control. I stored them in Gatwick Police Station exhibits store on Saturday 7th December 2002 and retrieved them from that store on Monday 9th December 2002 and conveyed them to secure offices in London.

The documents are exhibited as listed below: -

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>BATCH</b>	<b>SEAL</b>
SAG/100	Encase report re desktop computer of Thomas REEDY		C0633956

SAG/101	Encase report re laptop computer of Thomas REEDY		C0633889
SAG/102	Encase report re computer of Dustin VAN HUSS		C0633961
SAG/103	Encase report re computer of Jessica BALDWIN		C0633909
SAG/104	Encase report re computer of Jessica BALDWIN		C0633887
SAG/105	Encase report re computer of David CRUZ		C0633960
SAG/106	Webmaster data re Peter RANSON		C0634059
SAG/107	Webmaster data re Ian BICKNELL		C0634061
SAG/108	Webmaster data re ROWELL		C0634057
SAG/109	Webmaster data re Jon WARD		C0634055
SAG/110	Complaint List		C0634066
SAG/111	E-Mails re site named 'Children of God'		C0633997
SAG/112	Banner re site named 'Cyber Lolita'		C0634000
SAG/113	Website page re 'Fantastic Site'		C0634037
SAG/114	Banner re site named 'Just Grow Up'		C0634039
SAG/115	E-Mails re site named 'Lolita's Gallery,		C0634041
SAG/116	E-Mails re site named 'Lolita Hardcore'		C0634002
SAG/117	E-Mails re site named 'Lolita's Land'		C0634004
SAG/118	E-Mails re site named 'Children Playground		C0634065
SAG/119	E-Mails re site named 'Russian Child Porn'		C0634006
SAG/120	E-Mails re site named 'Blackcat Lolita'		C0633064
SAG/121	E-Mails re site named 'Russian Lolita Video'		C0634008
SAG/122	E-Mails re site named 'Child Rape'		C0634036
SAG/123	E-Mails re site named 'Russian Preteen'		C0634009
SAG/124	E-mails re site named 'Beautiful Age'		C0634034
SAG/125	E-Mails re site named 'Special Site'		C0634012
SAG/126	E-Mails re site named 'Lolita World'		C0634013
SAG/127	E-Mails re site named 'XXX Preteen'		C0634015
SAG/128	E-Mails re site named 'Children Forced to Porn'		C0634032
SAG/129	Charge backs October 1998		C0634017
SAG/130	Charge backs August 1998		C0634027
SAG/131	Charge backs June 1998		C0634030
SAG/132	Charge backs October 1998		C0634063
SAG/133	American Express Charge backs December 1998		C0633953
SAG/134	Charge backs November 1998		C0633954
SAG/135	Charge backs December 1998		C0633959
SAG/136	Charge backs June 1999	Beige File	C0634051
SAG/137	Charge backs August 1999	Beige File	C0634050
SAG/138	Charge backs December 1998	D4624411	C0633952
SAG/139	Charge backs April 1999	A00840593	C0634019
SAG/140	Retrieval Requests	A00840596	C0634049
SAG/141	Charge backs May 1999	A00840592	C0634029
SAG/142	Charge backs May 1999	A00840592	C0634025

SAG/143	Charge backs June 1999	A00840592	C0634020
SAG/143A	Charge backs June 1999	A00840592	C0633958
SAG/144	Charge backs April 1999	A00840593	C0634024
SAG/145	Charge backs January 1999	A00840593	C0634022
SAG/146	Charge backs December 1998	A00840596	C0634044
SAG/147	Charge backs August 1999	A00840682	C0634053
SAG/148	Charge backs June 1999	A00840690	C0633886
SAG/149	Charge backs June 1999	A00840590	D4624430
SAG/150	Charge backs May 1999	A00840596	C0633962
SAG/151	Charge backs 1999	A00840595	C0633946
SAG/152	Charge backs October 1998	A00840595	C0633907
SAG/153	Charge backs	A00840595	C0633947
SAG/154	Charge backs November 1998	A00840595	C0633949
SAG/155	Charge backs December 1998	A00840595	C0633946
SAG/156	Charge backs March 1999	A00840593	C0633911
SAG/157	Charge backs February 1999	A00840593	C0633924
SAG/158	Charge backs April 1999	A00840593	C0633895
SAG/159	Charge backs April 1999	A00840593	C0633926
SAG/160	Charge backs February 1999	A00840593	C0633869
SAG/161	Charge backs	A00840593	C0633945
SAG/162	Charge backs August 1998	A00840592	C0633869
SAG/163	Charge backs August 1998	A00840593	C0633908
SAG/164	Charge backs March 1999	A00840593	C0633891
SAG/165	Charge backs December 1998	A00840593	C0633934
SAG/166	Retrieval Requests	A00840593	C0634018
SAG/167	Retrieval Requests	A00840694	C0633872
SAG/168	Retrieval Requests	A00840686	C0634048
SAG/169	Retrieval Requests	A00840685	C0633876
SAG/170	Retrieval Requests	A00840684	C0634047
SAG/171	Retrieval Requests	A00840683	C0633873
SAG/172	Retrieval Requests	A00840677	C0633883
SAG/173	Retrieval Requests	A00840596	C0633966
SAG/174	Retrieval Requests	A00840596	C0633964
SAG/175	Retrieval Requests	A00840592	C0633888
SAG/176	Retrieval Requests	A00840593	C0633903
SAG/177	Retrieval Requests	A00840593	C0633928
SAG/178	Retrieval Requests	A00840592	C0633901
SAG/179	Retrieval Requests	A00840592	C0533890
SAG/180	Retrieval Requests	A00840592	C0633917
SAG/181	Retrieval Requests	A00840594	C0633893
SAG/182	Retrieval Requests	A00840593	C0633910
SAG/183	Retrieval Requests	A00840592	C0633919

SAG/184	Retrieval Requests	A00840592	C0633894
SAG/185	Merchant Statements	A00003175	C0633916
SAG/186	Merchant Statements	A00003186	C0633885
SAG/187	Paydays December1998	A00840688	C0633900
SAG/188	Paydays November 1998	A00840688	C0633898
SAG/189	Paydays September 1998	A00840688	C0633912
SAG/190	Paydays October 1998	A00840688	C0633931
SAG/191	Paydays January 1998	A00840688	C0633925
SAG/192	Paydays February 1998	A00840688	C0633929
SAG/193	Paydays April 1998	A00840687	C0633906
SAG/194	Paydays July 1998	A00840687	C0633884
SAG/195	Paydays April 1998	A00840687	C0633927
SAG/196	Paydays January 1998	A00840687	C0633923
SAG/197	Paydays June 1998	A00840687	C0633915
SAG/198	Account quick report	A00840687	C0633914
SAG/199	Expenses by Vendors Summary	A00003176	C0633913
SAG/200	Landslide balance sheet	A00003189	C0633932
SAG/201	Ageing Summary	A00003786	C0634046
SAG/202	Landslide Executive Summary	A00003173	C0633930
SAG/203	Landslide monthly wire and e-mails	A00840699	C0633938
SAG/204	Reminders list	A00840687	C0633902
SAG/205	Cheque transfers	A00003779	C0633896
SAG/206	Cheque transfers	A00003781	C0633879
SAG/207	Webmaster data ROWELL-	A00840697	C0633875
SAG/208	Account details	A00840593	C0633987
SAG/209	Cancellation notices	A00840592	C0633920
SAG/210	Cancellation notices	A00840592	C0633918
SAG/211	Cancellation notices	A00840682	C0633955
SAG/212	Cancellation notices	A00840680	C0633874
SAG/213	Landslide workstation claim report	A00840592	C0633892
SAG/214	Photocopy of drivers licence 'BRIARS'		C0633943
SAG/215	Postal request 'Thomas WARD'	A00003766	C0633877
SAG/216	E-mail from Peter RANSON	A00840594	C0633882
SAG/217	E-mail from Edward KING	A00840690	C0633951
SAG/218	Site details	A00003766	C0633941
SAG/219	E-Mails	Box A Part 1	C0633939
SAG/220	Landslide data	Box A Part 2	C0633944
SAG/221	Landslide data	Box A Part 3	C0633957
SAG/222	Miscellaneous Papers	A00840694	C0634052
SAG/223	Miscellaneous Papers	A00003190	C0633875
SAG/224	Miscellaneous Papers	A00840580	C0634045
SAG/225	Miscellaneous Papers	D4624435	C0633880

SAG/226	Merchant Bank Letter from 'Electronic Bank'	A00003194	C0633904
SAG/227	Merchant Bank Letter from 'Bank One'	A00840584	C0633940
SAG/228	Merchant Bank Letter from 'Merchant Systems'	A00840689	C0633963

All of these items are stored under my control and are available for examination.

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Michael Mead**

Age if under 'over 18' (if over 18 insert 'over 18) US Postal Inspector

This statement (consisting of: 3 pages each signed by me ) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 4th February 2003

Signature: Michael E. Mead

Further to my statement dated the 2nd October 2002, I would like to add the following.

On 8th September 1999 I went to the premises of Landslide Inc. 1124 Seaman Street, Fort Worth, Texas to assist in the execution of a federal search warrant. Whilst in the premises, I assisted in the disconnecting and seizure, and removal of the following computer systems or forensic images of hard drives, which were owned and maintained by Landslide Inc. The main customer database was stored on a Sun Sparc machine. This system was given the unique reference number of A00843012 and consisted of two hard drives. It also had an external hard drive attached to it, which was given the unique reference number of A0084301 1. When the National Crime Squad forensically imaged these' hard drives they were given the exhibit numbers of NCS/001, NCS/002 and NCS/003. The Webmaster computer was stored on a Sun Ultra 1 machine. This system was given the unique reference number of A00003162 and consisted of two hard drives. When the National Crime Squad forensically imaged these hard drives they were given the exhibit numbers of NCS/004 and NCS/005.

The E-Mails were stored on a full tower computer. This system was given the unique reference number of A00843068 and consisted of one hard drive. When the National Crime Squad forensically imaged this hard drive it was given the exhibit number of NCS/011.

The finances of Landslide were conducted on a laptop computer. The forensic image of this hard drive was given the unique reference number of A00843010. When the N?tional Crime Squad forensically imaged this hard drive it was given the exhibit number of NCS/010.

I received the following computer systems, which were owned and maintained by Thomas and Janice Reedy. The computer systems were recovered from the home address of Thomas and Janice REEDY at 6561 Lake Oaks Circle, Lakeside, The home full tower computer was given the unique reference number of A00003167 and consisted. of one hard drive. When the National Crime Squad forensically imaged this hard drive it was given the exhibit number of NCS/007.

The home laptop computer was given the unique reference number of A00003165 and consisted of one hard drive. When the National Crime Squad forensically imaged this hard drive it was given the exhibit number of NCS/006.

I received the following computer system, which was owned and maintained by Thomas and Janice Reedy. The computer system was recovered from the secondary business location of 100 North Central Expressway, Suite 206, Dallas, Texas. The Sun Ultra 2 was given the unique reference number of A00843069 and consisted of two hard drives. When the National Crime Squad forensically imaged these hard drives they were given the exhibit numbers of NCS/008 and NCS/009.

Together with Mr Dane RITCHESON, I forensically imaged these drives and sealed the originals in a secure manner. I examined the imaged copies of all of these computers and produce the following exhibits: -

- |       |   |
|-------|---|
| MM/1  | Screen print of Click Here Child Porn Banner                      |
| MM/2  | Screen print of Childrape Website Home page                       |
| MM/3  | Screen print of various Website pages                             |
| MM/4  | CDROM containing eleven Web sites                                 |
| MM/5  | CDROM containing Landslide suspects from A00843012 and A0084301 S |
| MM/6  | Screen print of KEYZ registration web page                        |
| MM/7  | Screen print of Customer guidelines web page                      |
| MM/8  | Excel spreadsheet containing ORates table                         |
| MM/9  | Excel spreadsheet containing Short and Descriptive Website titles |
| MM/10 | CDROM containing Edit(1) God pages                                |
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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of David Cruz**

Age if under (if over 18 insert 'over 18') Service Desk Technician 18 Over 18 Occupation

This statement (consisting of: 5 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 6th Decemeber 2002

Signature: David Cruz

I am a resident of the United States and have lived in Fort Worth, Texas for six-seven years. I was employed in construction until February 1998 when I decided on a complete career change. I responded to an advertisement in the Star Telegram Newspaper to a company called Landslide Inc. who were looking to employ a customer service representative.

I attended an interview, which was conducted by the company owners, Thomas and Janice Reedy, along with two other employees don Reedy and Dustin Van Huss. I understood that the company was an Internet based organisation offering access, via websites, to adult pornography. I was offered the post and joined the company where I met the other employees, Dan Markham, Thomas Hughes and Bill Breitham.

Over the next few weeks I learnt that there were several thousand adult pomogroaphy websites all of which were owned by webmasters. The webmasters mainly lived abroad in places like Russia and Indonesia.

Thomas and Janice Reedy hosted these websites on the webmasters behalf. In fact they owned some sites themselves. This area of the business was known as Avs (adult verification site). The sites were split into three bands, Avs, Gold and Platinum. The higher the band the more you paid the longer the access. However this was a one off fee to purchase access to adult pornography.

Customers could apply for membership by e-mail or by post. Identification was required to prove legality to access by virtue of age. In most instances people would send in passports or drivers licences.

If the customer chose to access via the Internet they would get to the Landslide Inc site by typing in the URL [www.landslideinc](http://www.landslideinc) or via a hyperlink. Having selected the website they required, they would would complete a registration page and then submit this page to Landslide. Landslide Inc employed a Merchant company who verified the credit card details of the subscriber. The

.customer was then e-mailed a "user id" which would enable them access to the band of adult sites. At this time I would estimate 2,000 daily accesses to the Landslide Adult Pornography websites.

My job was to refund any person who requested such, irrelevant of the reason. To complete this task I manually accessed the customer database and verified the transaction and processed the refund. I would estimate 200 webmasters existed at this time and they were either wired the money, which they were owed or sent cheques. This money process was not part of my employment but I believe it was conducted by Janice Reedy.

After six months I was informed by Thomas Reedy that the business was expanding. I did not know the howl or whys but I knew that there was now an area called Keyz. After a while I realised that Keyz was another set of websites, in excess of 300. It had been developed to please the webmasters who wanted to earn more money. What these sites offered were child pornography at a set rate for a fixed period of time for access to each site. When I saw my first image I was repulsed.

As soon as I realised they were child pornographic websites I informed Thomas Reedy of my concerns. He told me that he had informed the FBI of the contents of these 300 plus websites and that they had asked him to allow the sites to continue in an effort to locate the webmasters/offenders.

I was promoted to site manager and given more access to the data. I was responsible for fielding e-mails to and from the webmasters. Although the Avs and Keyz sites were run identically, the daily transactions to the Keyz sites were four or five times the amount of transactions to the adult sites. This means there were possibly between 8,000 - 10,000 transactions to the child pornography websites a day.

To purchase access to the material the customer would need to type in the- URL either [www.landslideinc](http://www.landslideinc.com) (\*sic) or [www.keyz.com](http://www.keyz.com) They could also gain access to the site via a hyperlink. I do recall one of the first pages which appeared on this site, stated "Child Porn" with the offer to enter or exit. Once the customer had accessed the site they were shown teaser pages or banners. These had a couple of images of children being either physically or sexually abused. When the site that the customer wished to access was shown on the screen, they clicked on the banner and a sign-up page appeared, which required the customer to complete a name, address,, e-mail details, credit card details and select a password. Once this data was submitted to Landslide it went to a Merchant Banking Company who verified the data was accurate and that the card was not lost or stolen. Once this had been completed if all the data was verified the customer was e-mailed a 'user id'. This would then permit the customer to access to the child pornography images from that specific website assuming, they submitted their unique user id and previously selected password. The subscriber would only get access to that particular site for the set period of time. If further access was required then a new registration was needed.

There is no doubt that access to this material cannot have been obtained accidentally. Any reasonable person would understand this having viewed the process. There were sufficient clues to know the sites that they were purchasiung access to contained child pornography.

There were always lots of requested for refunds. I have heard every excuse that you can think of.

It was Landslide's policy to refund any person who asked for whatever reason, even those who requested such after almost completing their access time. Of all of the sites on the Keyz side that I viewed I saw images of child abuse. All of these children were under the age of sixteen years. All of these children were being subjected to sexual abuse. I also saw acts of bestiality. I do not recall the names of the sites that I saw these pictures on.

There is no doubt in my mind that the Keyz sites had the biggest draw. It was here that Thomas Reedy and Janice Reedy made the money.

As far as the customer database was concerned although a lot of it was automated it was accessed manually on a daily basis by the customer service representatives. I recall that the last month that Landslide was operating customers were given access to the sites without being charged any money. All of these people therefore would appear on the customer database without the transactions appearing on their credit cards. The customer database was populated automatically from the sign-up page. Each unique user id was e-mailed to the customer from this database. Therefore the supplied e-mailed details had to be accurate at the time the transaction was completed.

The completed transaction was stored on the database even after expiry of the account.

I was aware that this whole system was constructed and programmed by Thomas Hughes and Thomas Reedy.

It is true to state that the Keyz side of Landslide's business was the profitable side of the company. The financial profits of the company substantially increased once the Keyz side was introduced to the business.

Although I am now aware that the Keyz side of the business was engaged in child pornography I believed that this was under investigation by the FBI. Had I known that this was not the case I would have terminated my association with both Landslide and its owners.

All of the content of this statement is true to the best of my knowledge and belief. I am prepared to attend court if necessary.

Signature: David Cruz

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**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Sharon GIRLING**

This statement ( consisting of ~~43~~ 2 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 6<sup>th</sup> October 2002

Signature: Sharon GIRLING

I am a Police Officer involved in computer investigations on the Internet and have been so for four years. I am the case officer in the United Kindgom for an investigation into the activey of United States Company known as the Landslide Production Inc. or Landslide Inc. as it later became known.

Between the 2<sup>nd</sup> October 2002 and 4<sup>th</sup> October 2002 I visited the offices of the Postal Inspection Service in Fort Worth Texas were I obtained statements from officers involved in the case and obtained documents and exhibits from them.

The following are exhibits produced by me :

During the course of the US Postal Inspection Service investigation access to twelve randomly selected websites was purchased and documented. All of these were found to contain paedophilic images. They purchased access to the sites name 'Blackcat', 'Childgod', 'Childplay', 'Childrape', 'Forchild', 'Funky', 'Growup', 'Innoc', 'Lolihard', 'Loli', 'Nympho', 'Think'. During their time on these sites they downloaded images of child abuse. They have supplied me with a compact disk of the websites and images captured. I produce a selection of twelve images from those sites, which I produce as exhibit SAG/4.

On the Landslide home page, was a banner hyperlink which depicted the words 'Click Here Child Porn'. The words **Enter** and **Exit** in bold letters and underlined were displayed on an individual screen. I produce a copy of this screen as my exhibit SAG/11.

I have been supplied with a copy of the screen showing the 'childrape' website and produce it as my exhibit SAG/12 and a copy of other captured screens as produce them as my exhibit SAG/13.

I have been supplied with a registration/sign-up and produce it as my exhibit SAG/14.

I have been supplied with a copy of the customer guideines and produce them as my exhibit SAG/15.

Signature: Sharon GIRLING

**Form MG 11**

**Witness Statement**

(CJ Act 1967, s.9;MC Act 1980, ss.5A(3)(a) and 5B;MC Rules 1981, r.70)

**Statement of Sharon GIRLING**

Age if under 18 'over 18' (if over 18 insert 'over 18') Occupation Police Officer

This statement ( consisting of 10 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

Dated: 5<sup>th</sup> February 2003

Signature: Sharon GIRLING

Further to my statement dated 29th January 2003 I also produce the front screen of the Landslide website as my exhibit SAG/08. This page was stored on the cd rom supplied by Postal Inspector Michael MEAD as exhibit MM/4.

Signature: Sharon GIRLING