

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America
v.

MIKELL SHEPARD

Case No.

1:25-MJ-1001-MG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 23, 2024- October 24, 2025 in the county of Fayette in the
Southern District of Indiana, the defendant(s) violated:

Code Section

Counts 1-3
Title 18, United States Code,
Section 2251(a)

Count 4
Title 18, United States Code,
Section 2252A(a)(5)(B)

Offense Description

Count 1: Sexual Exploitation of Minor Victim 1, on or before October 12, 2025.
Count 2: Sexual Exploitation of Minor Victim 2, on or about June 23, 2024.
Count 3: Sexual Exploitation of Minor Victim 3, on or before September 29, 2025; and
Count 4: Possession of Child Pornography, on or about October 24, 2025.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

/s/ Jacob Espy

Complainant's signature

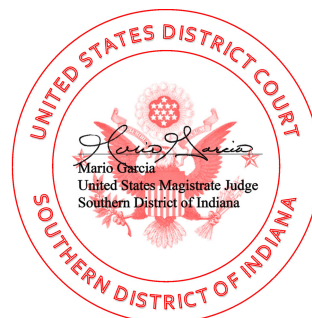
Special Agent Jacob Espy

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone *(reliable electronic means)*

Date: 10/28/2025

City and state: Indianapolis, Indiana



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jacob Espy, having first been duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with Homeland Security Investigations (“HSI”) and have been so employed since August of 2021. I am currently assigned to the HSI Indianapolis Internet Crimes Against Children group. My primary responsibilities include investigating criminal violations of the United States Code in the Southern District of Indiana. My experience in this position has included but is not limited to interviewing suspects, witnesses, and victims; executing arrests and searches; collecting and processing evidence; and analyzing records and digital evidence. I have completed advanced law enforcement training on the investigation of child exploitation crimes, and I have participated in numerous child exploitation investigations involving HSI and other state and federal law enforcement agencies. Throughout this investigation, I have consulted with other law enforcement officers and agents who have extensive training and experience regarding the investigation of child exploitation crimes.

2. I submit this affidavit in support of a criminal complaint charging MIKELL SHEPARD with three counts of Sexual Exploitation of a Child, in violation of 18 U.S.C. § 2251(a) and Possession of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

3. The statements contained herein are based on my personal knowledge and observations; information provided to me by other law enforcement; lawfully obtained evidence; reviews of various documents, records, and reports; and interviews conducted by law enforcement.

4. Because I am submitting this affidavit for the limited purpose of establishing probable cause, it does not include every fact I know concerning the investigation. I have only set forth the facts I believe are necessary to establish probable cause.

5. Unless otherwise noted, all references herein to times and dates are approximate, and all references herein to document contents and the statements of others are reported in substance and in part only.

6. **Probable Cause:** For the reasons listed below, there is probable cause to believe that MIKELL SHEPARD (SHEPARD) DOB 11-xx-2002 (known to affiant, but redacted) has committed the following offense in the Southern District of Indiana and elsewhere:

- a. **Count 1:** Sexual Exploitation of Minor Victim 1, in violation of Title 18, United States Code, Section 2251(a), on or before October 12, 2025.
- b. **Count 2:** Sexual Exploitation of Minor Victim 2, in violation of Title 18, United States Code, Section 2251(a), on or before June 23, 2024.
- c. **Count 3:** Sexual Exploitation of Minor Victim 3, in violation of Title 18, United States Code, Section 2251(a), on or before September 29, 2025.
- d. **Count 4:** Possession of Child Pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B), on or about October 24, 2025.

STATEMENT OF PROBABLE CAUSE

7. On October 23, 2025, HSI Indianapolis received CyberTipline Report #: 222253479 from the National Center for Missing and Exploited Children (“NCMEC”). The report included investigative findings submitted by Google to NCMEC on the same date, as well as additional NCMEC records pertaining to MIKELL SHEPARD.¹

8. The report indicated that within the Google Photos account belonging to MikellShepard2002@gmail.com, Google reviewed and identified more than 400 files depicting

¹ NCMEC’s CyberTipline is the nation’s centralized reporting system for the online exploitation of children. The public and electronic service providers can make reports of suspected online enticement of children for sexual acts, child sexual molestation, child sexual abuse material, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, and misleading words or digital images on the internet.

minors engaged in sexual acts.² Google also reviewed and identified more than 1,000 files depicting the lascivious exhibition of the anus, genitals or pubic area of minors. These files were included in the submission of the report.

9. Google records pertaining to MikellShepard2002@gmail.com identified the accountholder's name as "Mikell Shepard" and the accountholder's telephone number as XXX-XXX-1649 (known but redacted, hereinafter "Phone Number 1649"). Phone Number 1649 was last verified by the accountholder on August 28, 2025.

10. After receiving the CyberTipline Report, I reviewed multiple files that Google recovered within SHEPARD's Google Photos account, including, but not limited to:

- a. "Snapchat-1487256847.jpg": This image file was uploaded to SHEPARD's Google Photos account on July 3, 2024. The image depicts what appears to be a prepubescent female's exposed vulva as SHEPARD's hand³ is pulling down the child's pants and underwear. The child's vulva is the focal point of the image. Based on the child's lack of pubic hair development, as well as her genital development and the proportions of her vulva when compared to SHEPARD's hand, it is believed that she is prepubescent.
- b. "Snapchat-1672971034.mp4": This video file was uploaded to SHEPARD's Google Photos account on October 12, 2025. The video is 11 seconds in duration and depicts what appears to be a prepubescent female's exposed vulva as SHEPARD's hand is pulling down the child's pants and underwear. SHEPARD then extends his index finger, slightly inserts it into the child's vulva, and spreads

² Prior to submitting the Cybertip, Google opened and reviewed the suspect images and videos.

³ As set forth below, agents reviewed images of Shephard from his Facebook account that showed distinctive tattoos on his hands and arms. Agents were able to compare said images to images from the Google Cybertip (and other recovered images) and conclude that Shepard's arms/hands were in the image.

the child's labia. Based on the child's lack of pubic hair development, as well as her genital development and the proportions of her vulva when compared to SHEPARD's hand, it is believed that she is prepubescent.

- c. "Snapchat-1779142750.jpg": This image was uploaded to SHEPARD's Google Photos account on June 23, 2024. The image depicts what appears to be a prepubescent female's exposed vulva as the child is positioned atop a diaper with SHEPARD's index finger positioned on her thigh. The child's vulva is the focal point of the image. Based on the child's lack of pubic hair development, as well as her genital development and the proportions of her vulva when compared to SHEPARD's hand, it is believed that she is prepubescent.
- d. "20250929_082525_003.jpg": This image was uploaded to SHEPARD's Google Photos account on September 29, 2025. The image depicts what appears to be a prepubescent male's body as he is standing fully nude in a room. The child's exposed penis is a focal point of the image. Based on the child's lack of hair growth on his chest, stomach, pubis, and legs, as well as the child's scrotal and genital development, it is believed that he is prepubescent.

11. An additional Google Cybertip #222252922 further revealed that images contained within SHEPARD's Google account depicting suspect child pornography "appeared unfamiliar and homemade and/or newly produced" according to NCMEC.

12. Law enforcement databases revealed that Phone Number 1649 was associated to SHEPARD.

13. Law enforcement officers requested Google preserve the data on SHEPARD's accounts.

14. Additional law enforcement records determined that SHEPARD lived at XXX Reid Street, Connersville, Indiana, (known, but redacted) which is within the Southern District of Indiana.

15. Open-source research including publicly available information from SHEPARD's professional Facebook account revealed that SHEPARD advertises himself as a Professional Photographer who "works well with families, children, and infants." Many of the images on his professional Facebook account were of children under the age of 12.

16. Agents discovered that SHEPARD's publicly available personal Facebook account reposted many of the images and videos from his professional Facebook account, and listed SHEPARD as the owner of Shepard Photography and Boudoir by Shepard.

17. According to Witness A, SHEPARD has worked as a photographer for Busy Bee Daycare. Multiple sources further indicated that SHEPARD worked at Dublin Community Club skating rink and photographed children at a local gymnastics center.

18. On October 24, 2025, HSI and Indiana State Police assisted the Connersville Police Department in executing a state search warrant authorized by Circuit Court Judge Hubert Branstetter at SHEPARD's residence, as well as his person and vehicle. SHEPARD lived at the Reid Street location with Individual A (his mother), Individual B (his father), and Individual C (his minor brother).

19. During the execution of the search warrant, officers recovered numerous devices from SHEPARD's bedroom including: a black Samsung smart phone (bedroom office chair), a black Cannon camera (on floor near the bed), three SanDisk 256 gigabyte storage devices (inside the camera bag), a Micro SD Generic 1024 gigabyte storage device (inside the camera bag), a SanDisk 128 gigabyte storage device (inside the camera bag), a micro-SD 256 gigabyte image

mate pro storage device (inside the camera bag), a black Samsung cellular phone (inside the bedroom nightstand), and a Lexar 2 gigabyte SD card and a SanDisk Micro SD 8 gigabyte storage device (top blue drawer container on dresser). The following items were recovered from SHEPARD's bedroom closet: a white Galaxy Express phone, a silver and white iPod, a white Samsung phone, a black Motorola phone, a black AT&T Samsung phone, and a Samsung black phone. Agents also recovered a blue HP Laptop S/N SLB449SWHS and a Black Samsung Laptop S/N OSPR91JK8O1197A from the TV stand of the Living Room.⁴

20. According to Individual A, SHEPARD resided in the upstairs bedroom from which the above devices were seized. She identified the other upstairs bedroom as belonging to Individual C. She stated that Individuals A and B maintained their bedroom in the basement. Individual A stated that the devices including the camera in SHEPARD's bedroom belonged to him. According to Individual A, Individual C (SHEPARD's minor brother) has no interest in photography. According to Individual A, SHEPARD did not drive nor have a mode of transportation. Accordingly, SHEPARD relied in Individuals A and B to drive him to photography appointments and other appointments or relied on friends. According to Individual A, only Individuals A, B, and C, and SHEPARD had access to the Wi-Fi password for the last six months. According to Individual A, neither SHEPARD nor Individual C had significant others or overnight guests.

21. During a contemporaneous post-*Miranda* interview, which was audio and video recorded, SHEPARD, having waived his rights orally and in writing, agreed to speak to agents and stated the following in summary:

⁴ Individual A, B, and C's devices were seized and triaged and returned to them after they were cleared and no items of evidentiary value were discovered. Individuals A and B maintained a bedroom in the basement. Agents recovered a black Motorola phone and a pink phone with gold case in the nightstand of the basement bedroom belonging to Individuals A and B.

- a. SHEPARD confirmed his name and date of birth (November XX, 2002, known, but redacted). SHEPARD said that he lived at XXX Reid St. (known but redacted) with his mom, stepfather, and younger brother (Individuals A-C).
- b. According to SHEPARD, he dropped out of high school after completing the ninth grade. SHEPARD subsequently worked at multiple fast-food establishments and warehouses, as well as a local roller-skating rink and his stepfather's contracting company.
- c. Approximately two years ago, SHEPARD began studying photography and operating a self-owned photography business. SHEPARD said that he has a somewhat consistent customer base and previously worked out of a small photography studio on Central Ave. in Connersville, Indiana. SHEPARD's preferred photography styles include single portraits and maternity shoots.
- d. SHEPARD primarily captured photographs on a digital camera and then imported them to his cell phone. He edited them using the Adobe Lightroom application.
- e. SHEPARD operated accounts for his photography business on Facebook, Instagram, and Google, as well as personal accounts on Facebook, TikTok, Instagram, Snapchat, and Google.
- f. SHEPARD is the exclusive user of his Google and social media accounts, and cell phones.
- g. SHEPARD's Google accounts include shepardphotography2002@gmail.com and mikellshepard2002@gmail.com.
- h. SHEPARD has a Samsung Galaxy S24 cell phone, and his telephone number is XXX-XXX-1649 (known but redacted and matching Phone 1649). SHEPARD uses

fingerprint biometrics and/or a physical password to unlock his cellular phone, and he stated that no one else knows his password to his knowledge.

- i. SHEPARD previously watched lesbian pornography via commercial internet websites such as Pornhub prior to the enactment of state legislation restricting access thereto. SHEPARD claimed that he no longer watched pornography.
- j. Upon being advised that Google identified content in SHEPARD's account believed to be underage children, SHEPARD stated that it may have been caused by him taking numerous images of children as part of his photography business. SHEPARD stated that as a photographer, he has taken images of children in states of undress. He stated that the children's parents were present when the images were taken, and they signed a contract permitting SHEPARD to take the images in advance.
- k. Upon being advised that a number of files identified by Google had file names that included the word Telegram, agents asked SHEPARD about his familiarity with Telegram. SHEPARD replied that he did not want to "go into details about that". SHEPARD further said, "if I tell you what I use Telegram for it can add, it can add charges."
- l. SHEPARD initially joined Telegram to purchase marijuana. SHEPARD later stopped using marijuana and continued to use Telegram. SHEPARD is a member of Telegram chat rooms in which users exchange explicit pornographic content. SHEPARD has seen questionable content therein.
- m. SHEPARD said, "Truthfully, I know, that, I know I'm gonna get some charges", "I've been needing help for a long time", "I know this is fucking wrong", and "I

knew this conversation was gonna happen one day.”

- n. SHEPARD provided the physical password to his cell phone.
- o. Upon being presented with image “4-1”, SHEPARD identified the depicted child as Minor Victim 1 (“MV1”) and stated that he is friends with MV1’s mother, whom SHEPARD identified by name. SHEPARD stated that he took the image between six and eight weeks ago, and he believes MV1 is six years of age. SHEPARD wrote the names of MV1 and MV1’s mother on the paper containing the photograph. Image 4-1 is an image originally entitled “Snapchat-1487256847.jpg”, which was uploaded to SHEPARD’s MikellShepard2002@gmail.com Google Photos account on July 3, 2024. The image depicts a prepubescent child’s exposed vulva as SHEPARD’s hand is pulling down the child’s pants and underwear. The child’s vulva is the focal point of the image. The child has since been identified as MV1 and is prepubescent. This file was reported in CyberTipline Report #: 222253479.
- p. Upon being presented with image “4-2”, SHEPARD identified the depicted child as MV1. SHEPARD also identified his hand digitally penetrating MV1’s vulva in the image. SHEPARD stated that he took the image between six and eight weeks ago, and he felt sexual arousal from digitally penetrating MV1’s vulva. SHEPARD wrote MV1’s name on the paper containing the photograph. This image (4-2) is a still-frame from a video entitled “Snapchat-1672971034.mp4” which was uploaded to SHEPARD’s MikellShepard2002@gmail.com Google Photos account on October 12, 2025. The video is 11 seconds in duration and depicts a prepubescent female’s exposed vulva as SHEPARD’s hand is pulling down the child’s pants and underwear. SHEPARD then extends his index finger, slightly inserts it into the

child's vulva, and spreads the child's labia. MV1 has since been identified and is prepubescent. This file was reported in CyberTipline Report #: 222253479. I have reviewed this video, and it constitutes child pornography under Title 18, United States Code, Section 2256 **(COUNT 1)**.

- q. Upon being presented with image "4-3", SHEPARD identified the depicted child as Minor Victim 2 ("MV2") and stated that he was previously friends with MV2's father, whom he identified by name. SHEPARD also identified his hand in the image. SHEPARD stated that he took the image approximately one year ago when MV2 was approximately 9 months old. SHEPARD wrote the name of MV2's father on the paper containing the photograph. SHEPARD denied having sexual contact with MV2 and stated that he took photographs of her while he was changing her diaper. This image was originally entitled "Snapchat-1779142750.jpg" which was uploaded to SHEPARD's MikellShepard2002@gmail.com Google Photos account on June 23, 2024. The image depicts a prepubescent female's exposed vulva as the child is positioned atop a diaper with SHEPARD's index finger positioned on her thigh. The child's vulva is the focal point of the image. This child has since been identified as MV2 and is prepubescent. This file was reported in CyberTipline Report #: 222253479. I have reviewed this image, and it constitutes child pornography under Title 18, United States Code, Section 2256 **(COUNT 2)**.
- r. Upon being presented with image "4-4", SHEPARD identified the depicted child as Minor Victim 3 ("MV3") and stated that he is indirectly related to MV3 by way of his stepfather. SHEPARD stated that he took the image at MV3's residence approximately one month ago, and he believes MV3 is approximately 4 years of

age. SHEPARD wrote the names of MV3 and MV3's father on the paper containing the photograph. SHEPARD denied having any sexual contact with MV3. SHEPARD took approximately five images depicting MV3 using his cell phone. This image was originally entitled "20250929_082525_003.jpg" which was uploaded to SHEPARD's MikellShepard2002@gmail.com Google Photos account on September 29, 2025. The image depicts a prepubescent male's body as he is standing fully nude in a room. The child's exposed penis is a focal point of the image. This child has since been identified as MV3 and is prepubescent. This file was reported in CyberTipline Report #: 222253479. I have reviewed this image, and it constitutes child pornography under Title 18, United States Code, Section 2256 (COUNT 3).

22. In addition to the aforementioned children, SHEPARD admitted to interviewing agents that he produced images and/or videos depicting the following children engaged in sexually explicit conduct:

- a. SHEPARD took images depicting Minor Victim 4 ("MV4") approximately three years ago. SHEPARD wrote the names of MV4 and MV4's mother on a piece of paper.
- b. SHEPARD took images and videos depicting Minor Victim 5 ("MV5") approximately two weeks ago when she was approximately 4 years of age. SHEPARD identified MV5's mother by name and wrote it on a piece of paper.
- c. SHEPARD took images depicting Minor Victim 6 ("MV6") when she was approximately 10 years of age. SHEPARD identified MV6's mother by name.
- d. SHEPARD took images depicting Minor Victim 7 ("MV7") in a bathtub when she

was approximately 3 years of age. SHEPARD identified MV7's mother by name.

- e. SHEPARD took images depicting Minor Victim 8 ("MV8") when she was approximately one year old. SHEPARD identified MV8's mother by name.
- f. According to SHEPARD, he was close friends with MV1's mother and took images of MV1 while at her mother's residence. SHEPARD took explicit images and/or videos of MV1 on approximately 20 occasions.
- g. According to SHEPARD, he was close friends with MV6's mother and took images of MV6 while at her mother's residence.
- h. According to SHEPARD, he was a babysitter for MV2, MV3, and MV5 and took images of them while babysitting.
- i. According to SHEPARD, he is a relative of MV4 and took images of MV4 while in contact during family events. MV4 is the first child of which SHEPARD took sexually explicit images.
- j. SHEPARD was hired by MV7 and MV8's parents to take professional photographs depicting MV7 and MV8.
- k. SHEPARD denied ever making a child touch him in a sexual manner.
- l. SHEPARD stated that MV1 is the only child whom he has ever touched in a sexual manner, and such contact only occurred on one occasion, which is depicted in the video from which image "4-2" is a still-frame.
- m. According to SHEPARD, there are additional images of MV5 stored on an SD card at SHEPARD's residence. SHEPARD took some of these while MV5 was taking a bath.
- n. SHEPARD transferred explicit images and videos of children, including those he

captured, from his cell phone to his Google photos account. SHEPARD then deleted them from his cell phone. SHEPARD also captured some explicit images via his Snapchat account and saved them in the “My Eyes Only” section. SHEPARD’s Snapchat username is “mikelljovon”.

- o. SHEPARD denied distributing the images depicting MV1 – MV8 to anyone and stated they were “for [himself]”. When asked if he used the images of MV1 – MV8 to masturbate, SHEPARD replied, “I was pleased by them, yeah.” SHEPARD was asked whether he masturbated to the image in which he penetrated MV1, and he said yes.
- p. SHEPARD received, saved, and distributed explicit content depicting other children via Telegram. SHEPARD denied talking to other Telegram users about the children to whom he had access.
- q. MV3 is the only male child of whom SHEPARD took sexually explicit images. SHEPARD identifies as heterosexual and took the images of MV3 out of curiosity.
- r. As a photographer, SHEPARD took unclothed images of children with parental consent; however, SHEPARD “looked at them, like, kind of a different way ... at the time.”
- s. SHEPARD is sexually aroused by children, particularly juvenile females. SHEPARD babysat children because he knew it would enable him to have sexual contact with them.
- t. SHEPARD said, “I know I’m a shitty person for this. I’m sorry, I’m sorry to all the kids, I’m sorry to all the parents, I’m sorry to you guys for having to deal with this. I really am, I truthfully am. Honestly, I don’t, I don’t deserve to be on this Earth

for, for being this way. I don't, I don't know why I'm this way."

23. Law enforcement officers are in the process of fully identifying and interviewing Minor Victims 1-8 and their parents.

24. Agents received screen shots of messages from SHEPARD's personal Facebook account from witnesses in response to SHEPARD's arrest and search of his home on October 24, 2025. According to those screen shots, SHEPARD asked potential clients: "Awesome!!! 😊 Are you comfortable with her being nakey?" In different message string, SHEPARD said, "So, a few things! Please bring any blankets, toys and anything you think would be useful of the newborn shoot, also, I don't think asked, are you comfortable with nakey photos or do you prefer to keep her clothed."

25. During a preliminary triage of the micro-SD 256 gigabyte image mate pro storage device recovered from SHEPARD's camera bag in his bedroom, agents discovered a series of images of an unidentified minor female child from a photography session. In the series of images, the child, who appears to be toddler-aged is depicted nude. In the series, the child's vagina is visible in some of the images and in others a red sequined heart is covering the vagina. In several of the images, SHEPARD cropped the child's face out of the frame and the focal point of the image is the child's genitals. One said image in the series (IMG_3054.jpg) was created on or about January 30, 2025, and depicts the female minor child's vagina. The focus of the image is of the vagina, and the child's head is cropped out of the image. A tattooed arm is seen in the bottom right of the image. I have reviewed this image and it constitutes child pornography under Title 18, United States Code, Section 2256. **(COUNT 4)**.

26. A preliminary search of Micro SD Generic 1024 gigabyte storage device recovered from the camera bag inside of SHEPARD's bedroom revealed several images of unidentified

children that appear to have been created on or about August 30, 2024. The images begin by depicting the children swimming in a lake, and then show the children nude, showering or in some state of undress. The images then depict the children with their faces cropped out of the frame of the image and the focus of the images is of the children's genitals. The children in the image are prepubescent. One said image was created on or about August 30, 2024 (IMG_0475.jpg) and depicts a prepubescent female child whose face is cropped out of the image. The focus of the image is of the child's vagina. Her legs are spread in the image and she is depicted laying on a green, white, orange, and red beach towel. I have reviewed this image and it constitutes child pornography under Title 18, United States Code, Section 2256. **(COUNT 4).**

27. A full forensic search of SHEPARD's devices is ongoing.

CONCLUSION

28. Based on the above information, I respectfully submit that there is probable cause to believe that MIKELL SHEPARD committed the following offenses:

- a. **Count 1:** Sexual Exploitation of Minor Victim 1, in violation of Title 18, United States Code, Section 2251(a), on or before October 12, 2025.
- b. **Count 2:** Sexual Exploitation of Minor Victim 2, in violation of Title 18, United States Code, Section 2251(a), on or before June 23, 2024.
- c. **Count 3:** Sexual Exploitation of Minor Victim 3, in violation of Title 18, United States Code, Section 2251(a), on or before September 29, 2025.
- d. **Count 4:** Possession of Child Pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B), on or about October 24, 2025.

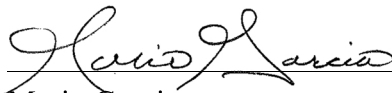
Respectfully Submitted,

____/s/ Jacob Espy_____

Jacob Espy
Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone

October 28, 2025.



Mario Garcia
United States Magistrate Judge
Southern District of Indiana