

The Honorable Patti B. Saris

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7 UNITED STATES DISTRICT COURT FOR THE
8 DISTRICT OF MASSACHUSETTS
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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 VINCENT ANZALONE,

14 Defendant.

NO. 15-10437-PBS

**DECLARATION OF FBI SPECIAL
AGENT DANIEL ALFIN**

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17 I, Daniel Alfin, declare as follows:

18 1. I am a Special Agent of the Federal Bureau of Investigation. I am currently
19 assigned to FBI Headquarters, Criminal Investigative Division, Violent Crimes Against
20 Children Section, Major Case Coordination Unit. My duties involve the investigation of
21 individuals using various types of technology to produce, distribute, and trade child
22 pornography.

23 2. I have been involved in the FBI investigation of the Playpen website since
24 it came online in approximately August 2014. Playpen was a website that existed on an
25 anonymous network and was dedicated to the advertisement and distribution of child
26 pornography. My duties have involved the review of Playpen on multiple occasions,
27 engagement in undercover activities on Playpen, and the coordination of investigative
28 activity with regard to identified members of Playpen such as the defendant.

1 3. I have prepared this declaration in response to the order of Hon. Chief
2 Judge Patti B. Saris, dated October 5, 2016, ordering the government to disclose the
3 analysis that I performed which demonstrates that there was no significant increase in
4 user activity on the Playpen website while it was under government control.

5 4. On or about February 20, 2015, I participated in the execution of a search
6 warrant at the Naples, Florida residence of Steven W. Chase. Chase was alleged to have
7 been the creator and primary administrator of the Playpen website. Chase was convicted
8 on multiple charges including engaging in a child exploitation enterprise at the
9 conclusion of a jury trial in the Western District of North Carolina in September 2016.

10 5. Among the evidence seized from Chase's residence was a flash drive that
11 contained multiple backup copies of the Playpen website. One such backup was
12 contained in a file named "pp-2-13-15.sql." The file contained information about when
13 users of the Playpen website had last accessed the Playpen website. The file indicated
14 that between January 31, 2015 at 0620 UTC and February 14, 2015 at 0620 UTC, 99,111
15 unique user accounts had logged in to the Playpen website.

16 6. In order to conduct this analysis I utilized a freely available program named
17 MySQL Workbench which is commonly used to analyze database files. Databases store
18 data in organizational units referred to as "tables." The table that I analyzed was named
19 "smf_members." The column containing the most recent login date for individual users
20 was named "last_login." Data in this column was stored in unix time format¹ which
21 represents dates and times by counting the number of seconds that have passed since
22 January 1, 1970. For example, the date of the most recent login stored in the file "pp-2-
23 13-15.sql" was recorded as "1423894853" which represents the date and time February
24 14, 2015 at 0620 UTC.

25 7. I have prepared a spreadsheet named "UserActivity_pp_feb14.csv"
26 containing a copy of the analyzed data that Mr. Anzalone may review in order to confirm
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¹ Unix time is commonly used by many software applications as the method for recording date and time.

1 that my calculations are accurate. The spreadsheet contains the user IDs of Playpen
2 members under the column named "id_member" as well as the date and time of that
3 user's most recent login under the column named "last_login." Additionally, in order to
4 assist Mr. Anzalone's review, I have added a column of data named "Last Login
5 (readable)" that contains date and time in the format "DAY/MONTH/YEAR TIME." The
6 "Last Login (readable)" column was generated by applying the following formula to the
7 column named "last_login": =CELL/(60*60*24)+"1/1/1970"

8 8. The NIT warrant affidavit states that the Playpen website received over
9 11,000 unique visitors a week. This figure was calculated from analyzing a copy of the
10 Playpen website from January 2015. This calculation was done by calculating the average
11 number of unique user logins for the entire lifespan of the Playpen website; not just a two
12 week period at the height of its user activity. For the purpose of this declaration I have
13 performed this calculation again based on a file named "pp-1-13-15.sql." I conducted this
14 analysis using the same tools as in my analysis of the file named "pp-2-13-15.sql."

15 9. The process of conducting this analysis involved taking the total number of
16 unique user account logins for both active accounts, which was 167,342, and deleted
17 accounts, which was 82,664, and dividing that total, 250,006, by the approximate number
18 of weeks that the Playpen website had been active, 22, which is equal to approximately
19 11,364. The tables containing the data used to conduct this analysis were named
20 "smf_members" and "smf_log_actions."

21 10. Again, as with my analysis of the file "pp-2-13-15.sql," I have prepared
22 spreadsheets containing a copy of the analyzed data that Mr. Anzalone may review in
23 order to confirm that my calculations are accurate. The spreadsheets are named
24 "UserActivity_pp_jan13.csv" and "DeletedUsers_jan13.csv".

25 11. As demonstrated by the calculations I have detailed in this declaration,
26 there was no significant increase in user activity on the Playpen website while it was
27 under FBI control.

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EXECUTED: October 6, 2016.



DANIEL ALFIN
Special Agent, FBI