

STATE OF SOUTH DAKOTA )  
 )  
COUNTY OF HUGHES ) :SS

IN CIRCUIT COURT

SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA, )  
 )  
Plaintiff, )

Civ No. 07-234

v. )  
 )  
TED ALVIN KLAUDT, )  
 )  
Defendant. )

AFFIDAVIT OF  
BRENT GROMER

Affiant being duly sworn upon oath states as follows:

1. I am a certified law enforcement officer for the South Dakota Division of Criminal Investigation. I am currently the case agent assigned to the above-entitled investigation, and much of the information obtained in this investigation thus far is set forth in the Affidavit of Attorney General Larry Long filed in support of the initial Complaint in this case.

2. One of the items seized during the February 2, 2007 search of Defendant's home was a Toshiba laptop computer. This computer has since been subjected to a forensic analysis at the South Dakota State Forensic Laboratory. I have been in the process of reviewing the online conversations retrieved from this forensic analysis. This analysis has revealed that Defendant has used more than one internet identity to converse with various individuals. One such identity is studman2002000, and another is thephotoman\_2000.

3. I reviewed an online conversation between studman2002000 and an individual identified as a 14-year-old

STATE OF SOUTH DAKOTA  
CIRCUIT COURT, HUGHES CO.  
**FILED**

JUL 12 2007

By [Signature] Clerk  
By [Signature] Deputy

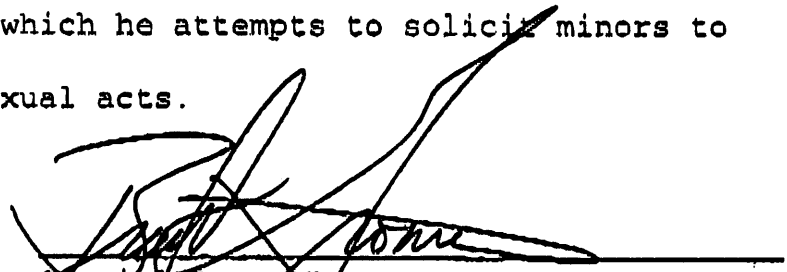
girl which occurred on October 31, 2006. Defendant, using the internet identity studman2002000, attempted to engage this 14-year-old in a conversation regarding her sexual experiences in very graphic language, and also attempted to get her to send him webcam images of herself. The Defendant also sent her pictures in return.

4. In addition, I reviewed an online conversation on December 26, 2006 between Defendant, using the identity, thephotoman\_2000, and an individual purporting to be a 21-year-old male. The Defendant represented himself as a modeling agent looking for males and females to perform in pornographic movies. The Defendant agreed to take naked photos of this individual and the Defendant further asked him to send webcam images of himself while performing sexual acts. This individual then sent the Defendant a photo which he represented to be his 15-year-old sister and offered to let the Defendant chat online with her. The Defendant then had a conversation with this 15-year-old and told her that he is a modeling agent and asked her to send him photos of herself. The Defendant then engaged in a sexually explicit conversation with her.

5. In addition, on May 30, 2007 I interviewed a woman who advised that she had fairly regular contact with the Defendant over the Internet and on his cell phone beginning in the fall of 2006 and continuing until approximately February of 2007. She would have been 18 years old at that time. The Defendant

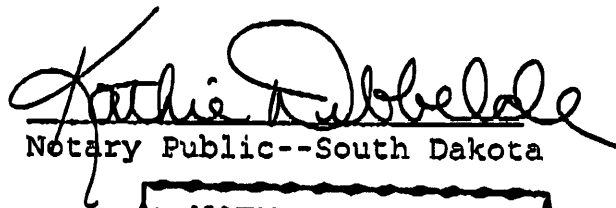
advised her that he needed photos of her in order to build a portfolio to send to various modeling agencies. The Defendant advised that sex toys were needed for an adult photo shoot. The Defendant also conversed on the Internet with this woman's sister, who advised him that she was only sixteen, and the Defendant likewise talked to her about sending him photographs and getting her into the modeling business.

6. Based upon my review of these online conversations thus far, it is apparent that the Defendant has engaged in a pattern of behavior in which he attempts to solicit minors to engage in prohibited sexual acts.



Special Agent Brent Gromer  
Division of Criminal Investigation  
1302 East Highway 14, Suite 5  
Pierre, SD 57501-8501  
Telephone: (605)773-3331

Subscribed to and sworn before me, a Notary Public, on this 10<sup>th</sup> day of July, 2007.



Notary Public--South Dakota

My commission expires:  
My Commission Expires  
July 1, 2012  
Kathie Dubbelde

(SEAL)

