

FILED
9/12/19

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

UNITED STATES DISTRICT COURT
for the

Middle District of Florida

United States of America)

v.)

JASON BRIAN GOFF)

Case No.)

3:19-mj- 1337-JRK)

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 August 13 through August 22, 2019 in the county of Clay in the Middle District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. § 2251(a)

Offense Description
Attempted production of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Complainant's signature

Benjamin J. Luedke, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 9-12-2019

Judge's signature

City and state: Jacksonville, Florida

James R. Klindt, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Benjamin J. Luedke, being duly sworn, state as follows:

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), the investigative arm of Immigration and Customs Enforcement (ICE), formerly known as the United States Customs Service. I have been assigned to the Office of the Assistant Special Agent in Charge, Jacksonville, Florida since August 2007. Prior to that, I was assigned to the Blaine, Washington office, beginning in July of 2002. I am a law enforcement officer of the United States and am thus authorized by law to engage in or supervise the prevention, detection, investigation or prosecution of violations of federal criminal law. I am responsible for enforcing federal criminal statutes under the jurisdiction of HSI, including violations of law involving the exploitation of children. I have attended the Basic Criminal Investigator School and the United States Immigration and Customs Enforcement Academy at the Federal Law Enforcement Training Center in Brunswick, Georgia, and I have received training in the area of Customs laws. In my capacity as a Special Agent, I have participated in numerous types of investigations, during the course of which I have conducted or participated in physical surveillance, undercover transactions and operations, historical investigations, extradition cases and other complex investigations. Prior to my employment with HSI, I worked as a federal police officer with the U.S. Capitol Police from June 2000 to March 2002. Since becoming a Special Agent, I have worked with experienced Special Agents and state and local law enforcement officers who also

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investigate child exploitation offenses.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423, as well as Florida state statutes that criminalize sexual activity with minors and other methods of child sexual exploitation. In connection with such investigations, I have served as case agent and have served as an undercover agent in online child exploitation cases. During the course of my investigations, I have worked closely with members of the local child exploitation task force comprised of agents and officers from HSI, the Federal Bureau of Investigation (FBI), the Florida Department of Law Enforcement (FDLE), the Jacksonville Sheriff's Office (JSO), the St. Johns County Sheriff's Office (SJSO), and the Clay County Sheriff's Office (CCSO), among other agencies. These agencies routinely share information involving the characteristics of child sex offenders as well as investigative techniques and leads. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge, as well as on information provided to me by experienced law enforcement officers and personnel. This affidavit is being submitted for the limited purpose of establishing probable cause for the filing of a criminal complaint, and I have not

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included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that JASON BRIAN GOFF has committed a violation of 18 U.S.C. § 2251(a), that is, attempted production of child pornography.

4. I make this affidavit in support of a criminal complaint against JASON BRIAN GOFF, that is, from on or about August 13, 2019, to on or about August 22, 2019, in the Middle District of Florida, JASON BRIAN GOFF, did attempt to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and which image was produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 2251(a).

5. On or about August 23, 2019, I spoke with Clay County Sheriff's Office (CCSO) Detective (Det.) Ryan Ellis, and he provided information about an ongoing investigation for violations of Florida statutes involving child sexual exploitation. I know Detective Ellis is a sworn CCSO Deputy Sheriff assigned to the CCSO Internet Crimes Against Children (ICAC) Unit, and is a member of the North Florida ICAC and therein conduct investigations involving internet crimes against children.

6. On August 28, 2019, I met with and discussed the details of this investigation with Det. Ellis. On the same day, he advised me of, in substance and among other things, the following:

a. On August 22, 2019, he received a phone call and subsequent investigative lead concerning a possible camera secreted in the girls' gym locker room at Clay High School in Green Cove Springs, FL. I have reviewed the report in its entirety. The report indicated that on August 22, 2019, Clay County Sheriff's Office (CCSO) Deputy and school resource officer T.A. Dunlap responded to a call in reference to a report by two 14-year-old female students, Minor Female 1 and Minor Female 2, of a suspected camera in a locked locker within the girls' gym locker room.

b. Deputy Dunlap and Vice Principal (VP) M. Lewis went to locker 152 located within the girls' gym locker room. The locker was locked using lock number 81447 V59. In the presence of Deputy Dunlap, VP Lewis opened the lock using a master key and discovered within the locker a Samsung Galaxy SIII smart phone taped to the side wall. The Samsung Galaxy SIII was secured to the wall using athletic tape and positioned with the camera lens pointed out of a pre-fabricated hole on the side wall of the locker. The Samsung Galaxy SIII camera lens was pointed in the direction of the girls' gym bathroom, in an area where minor children may change their clothes and dress. In addition, a blank white card from a rolodex was taped over the back of the Samsung Galaxy SIII in an effort to conceal its body. Deputy Dunlap secured the Samsung Galaxy SIII, athletic tape, and lock and subsequently submitted them into evidence on the same day. VP Lewis indicated to Deputy Dunlap that locker 152 and lock 81447 V59 were not assigned to a student.

c. Minor Female 1 told Deputy Dunlap that she noticed a hole where a screw would go in the side of the locker when she was waiting for Minor Female 2 and walking towards the locker. She said the inside of the hole looked like a camera. Minor Female 1 said Minor Female 2 went and told one of the coaches what Minor Female 1 had seen.

d. Minor Female 2 told Deputy Dunlap she was in the locker room putting on lip gloss when Minor Female 1 saw the camera lens. Minor Female 2 said she informed Coach Thompson, who told her to get her stuff out of the locker room and, when the bell rings, to go to lunch.

7. On August 28, 2019, Det. Ellis and I met with Deputy Dunlap and VP Lewis at Clay High School and confirmed the report summarized above. In addition, Det. Ellis and I viewed and inspected locker 152 and the pre-fabricated hole on the side wall of the locker from the view point from which the Samsung Galaxy SIII camera lens was arranged. Det. Ellis and I also observed the vantage point of the Samsung Galaxy SIII when it was positioned in locker 152, and it includes the exterior of bathroom stalls and large mirrors in which high school aged juvenile females may stand in front of while in states of undress before or after athletic activities. In addition, VP Lewis told me that lock 81447 V59 has a black dial, while all other issued gym locks have a green dial, and the lock was secured backwards on locker 152. VP Lewis told me that a backwards lock secured on a locker indicates the locker and lock are not

assigned to a student. While speaking further with Deputy Dunlap, he indicated the administration, gym coaches, and janitors are the only people allowed access to the locks, combinations and master keys. Deputy Dunlap also indicated the lock found was a V59 lock and is not a lock that should be in the girls' locker room. The locks in the girls' locker room are all supposed to have green dials. The lock discovered on locker 152 had a black dial. In addition, it was turned around and facing inward, with the black dial not plainly visible. This is usually done by school staff to indicate a locker is not in use or checked out.

8. On August 28, 2019, Det. Ellis and I also spoke with Stefanie Waugh, a physical education teacher at Clay High School. Coach Waugh indicated the only person she knows of other than herself, coaches, or students who go in the locker room is the janitor, JASON BRIAN GOFF. Coach Waugh indicated she saw the Samsung Galaxy SIII on August 22, 2019 in the locker and also saw a rolodex card taped over the phone. Coach Waugh indicated she found it odd that a V59 black lock was on the locker and explained black locks and model V59 locks are not used in the girl's locker room and not many people are aware of that. Coach Waugh indicated she asked JASON BRIAN GOFF several weeks ago to unlock a lock and he told her he could not open any locks except V59 models because he has a master key for the V59 locks. I observed numerous V59 locks in the football locker room, located right upstairs from the girls' locker room. Coach Waugh also indicated JASON BRIAN GOFF is

assigned to clean the girls' and boys' locker rooms and the gym on a regular basis. Coach Waugh and Deputy Dunlap both indicated the tape and phone appeared to have been recently installed in locker 152. Coach Waugh confirmed the tape used to secure the phone on the wall of the locker was athletic style and easily accessible throughout the gym. Coach Waugh also indicated JASON BRIAN GOFF typically starts work at noon and works until 8pm, often times alone. Coach Waugh then took me and Det. Ellis to the janitor supply closet in the gym, which JASON BRIAN GOFF uses and to which he has access. While in the closet, I observed a notebook with the words "Supplies Jason" written down, along with several cleaning supplies listed. Taped on the wall with white athletic tape was a Clay High School sports schedule. The tape is white in color and appears to be the same or similar to the tape used to secure the phone and rolodex card within locker 152.

9. On August 28, 2019, Det. Ellis and I also spoke with Janitorial Supervisor Janet Lanier. Supervisor Lanier confirmed there are twelve (12) janitors assigned to the school, to include JASON BRIAN GOFF. Supervisor Lanier provided a log which indicated JASON BRIAN GOFF is assigned to the girls' locker room and other areas in the gym. While speaking with Supervisor Lanier, I observed numerous rolodex style cards on her desk. When asked about the rolodex cards, Supervisor Lanier told me she gives them to the janitors to notate supplies they need and uses the cards as a form of communication. Supervisor Lanier indicated JASON BRIAN

GOFF has access to and has used the cards in the past. Supervisor Lanier also provided a rolodex card. Det. Ellis and I later obtained employment time and logs from VP Lewis confirming JASON BRIAN GOFF's employment beginning July 24, 2018 through August 23, 2019. VP Lewis confirmed JASON BRIAN GOFF was still currently employed but the provided records had not been updated beyond August 23, 2019. I have reviewed the employment logs and JASON BRIAN GOFF worked each weekday, Monday through Friday, from August 5, 2019 to August 23, 2019. In addition, VP Lewis was shown the rolodex card and advised it was similar to the one he observed when the Samsung Galaxy SIII was discovered in locker 152 on August 22, 2019, as referenced above.

10. On September 6, 2019, I spoke with Coach Waugh and she advised that the girls' gym locker room is the only girls' gym locker room at the school. She also advised that there are a minimum of sixty (60) lockers currently in use by high school female students and that students must change into gym uniforms for physical education class. The girls in all gym classes use the girls' locker room before and after gym class to prepare for gym class. The locker rooms are also available for use for changing for sports before or after school as there is not a separate locker room for athletes.

11. I have checked the Clay High School calendar at <https://www.oneclay.net/Page/76#calendar9307/20190806/month> for the month

of August and I know that school was in session beginning on August 13, 2019 and continuing through August 22, 2019. I also know that the age of high school students can vary but mostly include the age range of 13-18 year olds. Because the Clay High School girls' locker room was used by Clay High School students, I know some of the individuals who changed their clothes may have been minors under the age of 18.

12. On September 9, 2019, I applied for and was granted a search and seizure warrant, case number 3:19-mj-1323-JRK, for the Samsung Galaxy SIII smart phone. On the same day, Det. Ellis transported the phone to me and I subsequently transferred it to Computer Forensic Analyst Van Wilson for forensic analysis. I have examined the Samsung Galaxy SIII smart phone and the storage card discovered within. The Samsung Galaxy SIII smart phone has a stamp indicating it was made in China and the storage card has a stamp indicating it was made in Phillipines.

13. On September 10, 2019, Det. Ellis and I conducted a review of the images and videos discovered on the Samsung Galaxy SIII smart phone. One particular video, approximately 31:53 in length, displays numerous high school aged girls in various states of undress before or after athletic activities. For example, one girl is changing into a pair of shorts and bends over, exposing her thong underwear and bare buttocks to the hidden phone camera. At another point 4-5 girls are in view of the phone camera and change into athletic wear, to include one that is directly in front of the phone camera and faces the camera in a white sports bra. Within one (1) minute of the last

girl observed leaving the locker room, the phone is removed from its hiding place. While it was being removed and still recording, a white and gray pattern is recorded before the phone pans towards the ground and records what appears to be a turquoise pillow on a black leather couch, as well as a Clay County School identification badge hanging from the waist of the person holding the phone. The person in the identification badge is a white male and is wearing a bright orange shirt. The vantage point of the described recording above is different from where the Samsung Galaxy SIII was discovered on August 22, 2019. Det. Ellis and I confirmed JASON BRIAN GOFF is the person in several "selfie" images discovered on the Samsung Galaxy SIII by comparing the "selfies" to JASON BRIAN GOFF's Florida driver's license photograph that I reviewed from the Florida Driver and Vehicle Information Database. In addition, the phone number for the Samsung Galaxy SIII was found to be a phone number ending in 3671 and in communication via text messages with a phone number ending in 4712.

14. On September 11, 2019, Det. Ellis and I again met with VP Lewis and Coach Waugh. Per my request, VP Lewis showed me JASON BRIAN GOFF's 2018-19 school yearbook photograph. In the photograph, JASON BRIAN GOFF is wearing a bright orange tshirt and it appears to be the same photo on the identification badge visible at the end of the recording referenced in the paragraph above. VP Lewis advised that identification badges were just changed for this new school year but typically the

same photograph as those used in the yearbook were used to generate the identification badges. VP Lewis provided JASON BRIAN GOFF's former identification badge and the photograph is the same one from the yearbook. VP Lewis also provided an address form which appears to have been filled out by JASON BRIAN GOFF. On the form, JASON BRIAN GOFF provided a phone number ending in 4712, which was the same number I discovered in text messages from the forensic review of the Samsung Galaxy SIII, and an emergency contact telephone number of his wife's phone number ending 3671, the same number I discovered in communication with the phone number ending in 4712 from the forensic review of the Samsung Galaxy SIII.

15. On September 11, 2019, Det. Ellis and I again visited the girls' gym locker room. While in the locker room, I discovered the vantage point of the video recording described in Paragraph 13 appeared to be from behind an observation window within Coach Waugh's office. From inside Coach Waugh's office, I observed the window was covered in opaque white and gray patterned contact paper and further obstructed by photographs and pictures belonging to Coach Waugh. When the photographs and other decorations were removed, I observed a small cutout in the contact paper in the shape of a triangular-like piece of pizza, approximately 2 inches in size and approximately 16 inches above the window sill. Det. Ellis and I observed the same black leather couch and turquoise pillow up against the wall underneath the window in Coach Waugh's office. The cutout was not immediately visible from within Coach

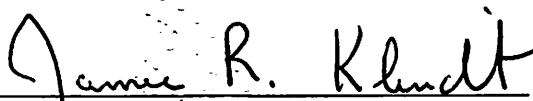
Waugh's office because it was covered by items leaning up against the window. I confirmed with VP Lewis and Coach Waugh that JASON BRIAN GOFF has access to Coach Waugh's office via a master key for the purpose of emptying the trash and other maintenance.

16. Based upon the foregoing facts, I have probable cause to believe that from on or about August 13, 2019, to on or about August 22, 2019, in the Middle District of Florida, JASON BRIAN GOFF, did attempt to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and which image was produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 2251(a).



Benjamin J. Luedke, Special Agent
Homeland Security Investigations

Subscribed and sworn to before me this 12th day of September, 2019, at Jacksonville, Florida.



JAMES R. KLINDT
United States Magistrate Judge