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# UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America  V.  PRASAN NEPAL, aka "TRIPPY,"  and  LEONIDAS VARAGIANNIS, aka "WAR,"  Defendant(s)	Case: 1:25-mj-00061 Assigned To : Faruqui, Zia M. Assign. Date : 4/15/2025 Description: COMPLAINT W/ARREST WARRANT  CRIMINAL COMPLAINT
•	hat the following is true to the best of my knowledge and belief.
	21 to the Present in the county of in the
	nia , the defendant(s) violated:
Code Section 18 U.S.C. § 2252A(g) (Chile	Offense Description  Id Exploitation Enterprise)
This criminal complaint is based on the SEE ATTACHED AFFIDAVIT	hese facts:
<b>♂</b> Continued on the attached sheet.	
Attacted to by the applicant in accordance with	Complainant's signature  Andrew Rust, Special Agent  Printed name and title
Attested to by the applicant in accordance with Telephone	(specify reliable electronic means).
Date: 04/15/2025	
	Judge's signature
City and state: Washington,	DC U.S. Magistrate Judge Zia M. Faruqui  Printed name and title

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

PRASAN NEPAL, aka "TRIPPY," and

LEONIDAS VARAGIANNIS, aka "WAR,"

Defendants.

Case: 1:25-mi-00061

Assigned To: Faruqui, Zia M. Assign. Date: 4/15/2025

Description: COMPLAINT W/ARREST WARRANT

**UNDER SEAL** 

# AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Andrew Rust, being first duly sworn, hereby depose and state as follows:

#### INTRODUCTION AND AFFIANT BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been so employed since December 2022. I am currently assigned to the Washington Field Office investigating matters involving Counterterrorism and Nihilistic Violent Extremism ("NVE"). As a Special Agent with the FBI, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.
- 2. I have gained experience through training with the FBI and in everyday work related to conducting these types of investigations. During my career as a Special Agent, I have (a) conducted physical and wire surveillance; (b) participated in the execution of search warrants and arrest warrants for various crimes; (c) reviewed and analyzed numerous recorded conversations and other documentation of criminal activity; (d) interviewed confidential human sources, subjects and victims; and (e) monitored wiretapped conversations of individuals engaged in various crimes. I have participated in investigations involving computer-related offenses and have executed

numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. As part of my duties as a Special Agent, I investigate federal criminal offenses, including the sexual exploitation of children and the distribution of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A.

- 3. I respectfully submit that there is probable to believe that the defendants have committed violations of Title 18, United States Code, specifically violations of 18 U.S.C. § 2252A(g) (Child Exploitation Enterprise, hereafter "SUBJECT OFFENSE").
- 4. I have been personally involved in the investigation of this matter. I am familiar with the information contained in this Affidavit based on my participation in the investigation, my review of documents and other evidence, my conversations with other law enforcement officers, and my training and experience. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendants, I have not included the details of every aspect of the investigation. Where actions, conversations, and statements of others are related herein, they are related in substance and in part, except where otherwise indicated.

#### **PROBABLE CAUSE**

## The Child Exploitation Enterprise

5. Defendants NEPAL, aka "Trippy," and VARAGIANNIS, aka "War," the defendants herein, did knowingly engage in a child exploitation enterprise, that is NEPAL and VARAGIANNIS were among the leaders of the NVE group "764,1" the purpose of which was, among other things, to exploit vulnerable children online, including by facilitating and directing

and exploitation of vulnerable populations, including minors.

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<sup>&</sup>lt;sup>1</sup> 764 is a network of NVEs who engage in criminal conduct within the United States and abroad. The 764 network's accelerationist goals include social unrest and the downfall of the current world order, including the United States Government. Members of 764 work in concert with one another towards a common purpose of destroying civilized society through the corruption

the production, distribution, and receipt of child pornography, as defined in Title 18, United States Code, Section 2256(8). In doing so, the defendants violated Chapter 110 of Title 18 of the United States Code, as part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, which offenses are described below and committed those offenses in concert with three or more other persons. 764 operated throughout the world, including in the District of Columbia.

6. Certain 764 members, including the defendants and several co-conspirators, coordinated their conduct through various internet-based groups and channels, including a private group on an encrypted messaging application ("Platform A") known as "764 Inferno." Access to 764 Inferno was reserved for the inner core of 764 members who had been invited by the leaders of 764, including Defendants NEPAL and VARAGIANNIS, and Co-Conspirator 1, a 764 member who was known by the moniker "Fail."

## Means and Methods of the 764 Child Exploitation Enterprise

- 7. Among the means and methods by which Defendants NEPAL and VARAGIANNIS and other 764 co-conspirators conducted the affairs of the 764 Child Exploitation Enterprise, were the following:
  - a. Members of 764, both individually and as a group, methodically targeted vulnerable populations, including minor girls with mental health challenges, and attempted to socially engineer them, gain their trust, and then groom them

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References throughout this affidavit to "764" refer to the larger 764 group, which includes leaders and members associated with various internet-based groups and channels. References throughout this affidavit to "764 Inferno" refer only to the 764 Inferno channel hosted on an encrypted messaging application.

- to share private information and intimate visual depictions of themselves engaged in sexually explicit conduct.
- b. Armed with this private information and intimate images of their victims, 764 members would then use this material to coerce victims into providing more extreme and degrading content, such as images of the victims cutting the names of 764 members into their bodies, setting themselves on fire, abusing their pets or siblings, and even suicide.
- c. The 764 members would then compile the material that they obtained from their victims into edited "Lorebooks" that they would then share within 764 channels.
- d. In their leadership roles, Defendants NEPAL and VARAGIANNIS recruited prospective 764 members based on the quality and notoriety of the content they produced and posted online.
- e. Content, including Lorebooks containing child pornography, served as valuable currency within the 764 criminal enterprise. The content generated and shared by 764 members through the extortion and sexual exploitation of vulnerable minor victims not only resulted in the individual 764 members earning invitations to join 764 Inferno and 764's inner core, and maintaining and increasing their position in the group, but the content also served the ends of the 764 enterprise itself by gaining more attention and notoriety for the group and attracting more prospective recruits to join, thereby furthering the goals of 764 by spreading the group's NVE ideology.

- f. After 764 members created and shared their content, the material was often stored in online "vaults" managed by designated 764 members who agreed to preserve the material for other members if they were "fedded," i.e. arrested or otherwise disrupted by law enforcement.
- g. Members of 764 have also engaged in acts of real-world violence, such as destroying property, spray-painting 764 monikers and iconography on public buildings, physical abuse of animals, and physical assaults on people, including stabbings and attempted murder.
- 8. The group has shifted names over time and spawned known offshoot groups. Although the group moves between social media channels and changes its name, the core members, methods, and goals of the group remain consistent and appear under the overarching threat of 764.

# Defendants Background in 764

9. Defendant NEPAL has been involved with 764 since the group's inception, in or around late 2020 or early 2021, and was present in the group with its founder, Individual 1.3 After Individual 1 was arrested on or about August 25, 2021,<sup>4</sup> NEPAL emerged as a leader of 764, and has remained in this position to this day. In his capacity as a member and leader of 764, NEPAL has used many online monikers, including, "Leather Jacket," "Rebirth," and "KingKrampus," but he was most widely known in 764 Inferno as "Trippy."

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Artifacts found in Individual 1's phone after his arrest include iMessages from July 1, 2021, between himself and NEPAL, in which the two discuss founding 764 together. Individual 1 is currently serving an 80-year sentence for Possession with the Intent to Promote Child Pornography, in violation of Texas Penal Code sec. 43,26.

- 10. Defendant VARAGIANNIS joined 764 in or around December 2023 and used monikers including, "mercyisweak," "mercyisweak2," and "sinisterfuck," but was commonly known within 764 Inferno as "War." VARAGIANNIS is a United States citizen. Throughout his participation in the 764 Child Exploitation Enterprise, VARAGIANNIS resided in Greece.
- 11. Defendants NEPAL and VARAGIANNIS were leaders of 764, and specifically were leaders of 764 Inferno. 764 Inferno leadership, including the defendants, conspired with group members to create and distribute images of the exploitation of minors. These images depicted both the sexual exploitation of minors as well as images depicting self-mutilation. The defendants controlled membership in and access to the group. The defendants posted instructions to group members regarding methods they should employ to exploit vulnerable minor children. The defendants also interacted with group members by commenting on the exploitation material they posted. 764 relied on members recruiting other members into the group in order to generate additional content, including child exploitation content, that could be distributed in the group.
- 12. From its inception, 764's tactics have included the production, distribution, and receipt of child pornography. As described above, Child Sexual Abuse Material ("CSAM") was often included in Lorebooks, which were shared widely in 764 channels and used to recruit and promote members and to gain attention for the group. These tactics were utilized within 764 as recently as 2024, while Defendants NEPAL and VARAGIANNIS were leaders of 764 and administrators of Inferno, as described herein.
- 13. Defendant NEPAL himself directly engaged in the receipt and distribution of CSAM. For example, on July 10, 2019, NEPAL stated in a conversation on Snapchat, "I got cp if

u wanna see it ... child porn ... I'll send it." On or about July 21, 2019, NEPAL stated further, "Nigga I got cp... I got child porn... if you wanna see it... I got child porn."<sup>5</sup>

- 14. After early 764 leaders were arrested and convicted of criminal offenses involving the production and distribution of child pornography, Defendant NEPAL began to make statements within 764 channels purporting to discourage tactics involving the production and distribution of CSAM, in order to avoid the attention of law enforcement.
- 15. On May 27, 2024, a member of Inferno posted an image of fully naked, girl who appeared to be a teenager, with the words "SKVLL IS EVIL" written on her naked. NEPAL responded, "Yes," "But I have to blur my vision cause that's a little girl."
- 16. That same day, May 27, 2024, NEPAL posted step-by-step instructions on how to groom and extort a potential victim, stating:

- 17. On August 28, 2024, Defendant VARAGIANNIS posted a list of purported rules for 764 Inferno, which included the admonition, "no pedophilia." Despite this statement, Defendants NEPAL and VARGIANNIS never removed links to Lorebooks containing CSAM and did not remove 764 Inferno members who posted this material. NEPAL explained on or about September 30, 2024, "we're not anti-extortion," "I'd rather have extortions continue than stop generally because it does in a way promote harm and teaches cringey e girls lessons."
- 18. Beginning in or around at least January 2024 and continuing through in or around March 2025, in the District of Columbia and elsewhere, Defendants NEPAL and VARAGIANNIS,

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<sup>&</sup>quot;go to Reddit"

<sup>&</sup>quot;or Twitter"

<sup>&</sup>quot;self harm community and speak with a girl like it's a normal friend"

<sup>&</sup>quot;then seduce her with how much you love how she cuts."

All messages are reproduced as they were found; typographical and grammatical errors are in the original. Your affiant understands that "cp" refers to child pornography.

in concert with Co-Conspirators 1-6, knowingly and willfully engaged in a child exploitation enterprise, that is, the commission of a series of felony violations enumerated in Title 18, United States Code, Section 2252A(g)(2), constituting at least three separate incidents involving more than one victim. In furtherance of the defendants' child exploitation enterprise, the defendants and their co-conspirators engaged in a series of child exploitation offenses, including Attempted Sexual Exploitation of a Child, in violation of 18 U.S.C. § 2251(a); Coercion and Enticement of a Minor and Conspiracy to Commit Coercion and Enticement of a Minor, in violation of 18 U.S.C. 2422(b); and Conspiracy to Distribute or Receive Child Pornography, in violation of 18 U.S.C. § 2252(a)(2), all Chapter 110 offenses. The felony violations committed by the defendants in concert with one another and with Co-Conspirators 1-6 are enumerated below.

#### Defendant's Co-Conspirators

- 19. While Defendants NEPAL and VARAGIANNIS were leading 764 Inferno, they conspired with and directed others within 764 Inferno to commit crimes in further of the 764 criminal enterprise. These co-conspirators included, but were not limited to:<sup>6</sup>
  - Co-Conspirator 1 aka "Fail,"
  - Co-Conspirator 2 aka "Slain,"
  - Co-Conspirator 3 aka "Axx,"
  - Co-Conspirator 4 aka "Praise," and
  - Co-Conspirator 5 aka "Kills."

In addition to Co-Conspirators 1-5 listed above, who were members of 764 Inferno during the time that Defendants NEPAL and VARAGIANNIS led and managed the 764 criminal enterprise, prospective 764 member "Xalloxs" ("Co-Conspirator 6"), performed an overt act of the conspiracy by storing 764-related content belonging to Co-Conspirator 5 on his digital devices in the District

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Each co-conspirator is identified by the moniker they used within 764 Inferno. These monikers have been attributed to three or more identified individuals.

of Columbia. This stored content, which was located on digital devices seized from Co-Conspirator 6 during the execution of a search warrant on March 19, 2025, included images of what appeared to be "764 Kills" written in red on a wall. In addition, there was another video found in Co-Conspirator 6's phone that depicted a minor teenage girl standing topless with her breasts exposed and talking to someone on a live chat while she poured bleach on her arm and set her arm on fire. The minor depicted in the video has been identified by the FBI as Minor Victim 1.

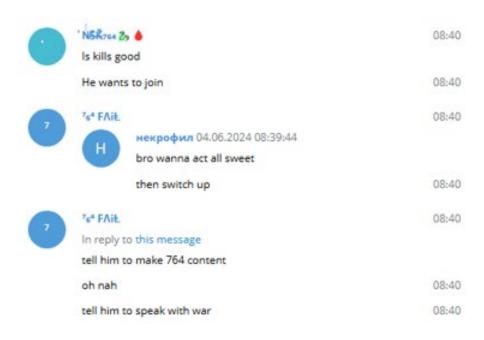
#### Defendants Control and Leadership of 764

- 20. Defendants NEPAL and VARAGIANNIS have acted as leaders of 764, including by directing and controlling the recruitment of 764 members and by performing the roles of owner and/or administrator of 764 Inferno. Defendants NEPAL and VARAGIANNIS, along with Co-Conspirator 1, controlled recruitment by exercising the power to include or exclude prospective 764 members who sought entry in the group. To be recruited to 764, or invited to the 764 Inferno , Defendants NEPAL and VARAGIANNIS required prospective members to produce and share content, which often included visual depictions of minors engaged in sexually explicit conduct or self-harm.
- 21. On or about June 5, 2024, while Defendants NEPAL and VARAGINANNIS were leading and managing 764, Co-Conspirator 5 expressed his desire to be recruited into 764. He contacted Co-Conspirator 2, writing, "yo lemme get recruited back to 764." Co-Conspirator 5 offered to produce "blood content" and claimed that he had "sluts lined up that'll do anything for me." Defendant VARAGIANNIS and Co-Conspirators 2, 3, and 4, discussed whether Co-Conspirator 5's content was good enough to allow him to join 764. Defendant VARAGIANNIS complimented Co-Conspirator 5's content, noting that he "already got a bitch to suicide for 764."

Referring to the video of the purported suicide produced and shared by Co-Conspirator 5, Defendant VARAGIANNIS added, "the ending was funny. When she fell over Imao."

- 22. On or about June 25, 2024, Defendant NEPAL asked Co-Conspirator 3, "who do you want me to recruit?" Co-Conspirator 3 responded, "Browser, auroa and kills," referring to Co-Conspirator 5. Defendant NEPAL replied, "we won't recruit them unless they do some crazy shit."
- 23. In further communications about Co-Conspirator 5 joining 764, another 764 member posted, "is KILLS good?" and "He wants to join." In response, Co-Conspirator 1 instructed the other member to ask Co-Conspirator 5 to "make 764 content," but later responded, "oh nah tell him to speak with war," referring to Defendant VARAGIANNIS. *See* Figure No. 1 below. The other 764 member responded, "KILLS is cool in my opinion" and shared a video with 764 Inferno, which shows what appears to be a young girl with blood on her abdomen. The video then moved up her body and shows what appears to be the word "Kills" in a red substance consistent with blood.

Figure 1



- 24. On or about July 4, 2024, Co-Conspirator 5 joined 764 Inferno. After joining the group, Co-Conspirator 5 posted several screenshots of his computer screen, which revealed a folder in the computer downloads with the title "Nudes," which included images or videos depicting what appeared to be naked teenage girls exposing their bare breasts and bare vaginas. Some of the girls have what appears to be names of 764 members written on their chests. In response to comments about the content that he posted, Co-Conspirator 5 stated, "u don't have as much cp as me tho."
- 25. Defendants NEPAL and VARAGIANNIS likewise directed others to produce content for the group. For example, on or about August 26, 2024, members of 764 Inferno discussed "bringing back extortion" and that the group would have "extorters editors." When Co-Conspirator 4 said, "lemme get in on that," Defendant VARAGIANNIS responded, "go for it," and explained that "only the best will get into inferno so everyone aware." As discussed in greater detail *infra*, Co-Conspirator 4 later shared content in 764 Inferno, which included CSAM depicting Minor Victim 2 ("MV-2").
- 26. On or about July 22, 2024, Defendant NEPAL removed another 764 Inferno member and stated that he would need to get "content" to join back again. In addition, on the same day Defendant NEPAL invited Co-Conspirator 2 to join 764 Inferno, Defendant NEPAL asked, "are you gonna beat some ass?" and then instructed Co-Conspirator 2 to use a weapon. Co-Conspirator 2 responded, "I'll find sum and do it." He then asked, "do I do a beatin tomorrow?" to which Co-Conspirator 1 responded, "yes on cam."
- 27. Defendants NEPAL and VARAGIANNIS, along with Co-Conspirators 1 and 2, created a "guide" that gave prospective 764 members explicit instruction on how to create content

for the group. The guide was shared by Defendant VARAGIANNIS in a public 764 channel on Platform A on or about September 13, 2024. *See* Figure No. 2 below.

Figure 2



28. The guide specifically instructed recruits on "grooming" victims into producing content for 764, and advised members to target particularly vulnerable victims, such as individuals with depression or mental illness, and referred to these targets as "e-girls." *See* Figure No. 3 below.

Figure 3



29. The defendants also provided instructions in the guide for "Extortion," and advised prospective 764 members to socially engineer girls and to groom them into trusting 764 members so that they could obtain information about the victim that could then be used to force her to create "blood content." *See* Figure No. 4 below.

Figure 4



30. In other communications, Defendant NEPAL provided guidance directly to other 764 members how to effectively groom and extort victims. For example, on or around September 30, 2024, NEPAL wrote, "Extortion is a form of discipline to little girls who might not have a father at home. It's a good thing." On or about October 4, 2024, LYC, a member of 764, posted a photo of a female with Lycan written across her exposed breasts in what appears to be black sharpie. LYC then posted, "Next time in blood," "I have ger school now so I could probably extort her out of that." Defendant NEPAL responded, "You can. You have this image and you have her

school, you can blackmail her and tell her you will show this picture to her family n friends. She can avoid if she just obeys you."

31. On or about August 31, 2024, Defendant VARAGIANNIS, using display name W, commented encouragingly on content posted by Co-Conspirator 4 in 764 Inferno. Co-Conspirator 4 posted a screenshot of a conversation with Minor Victim 3 ("MV-3") in which he discussed soliciting a blood sign from her. MV-3 was subsequently identified as a UK-based minor victim. The screenshot posted by Co-Conspirator 4 depicts MV-3 standing in a bathtub bleeding after stating, "I popped my cherry" i don't know what to do it won't stop bleeding." There was a dildotype sex toy visible in the image as well. The image appears to be taken by MV-3 and is pointing down at her feet such that her legs and feet are visible, with a substance that appears to be blood running down the inside of her leg. The sex toy is positioned next to her feet. In response, Defendant VARAGIANNIS commented, "I'm weak" and "I'm literally rolling rn<sup>8</sup>."

# Sexual Exploitation of Children and Conspiracy to Distribute Child Pornography

#### Minor Victim 4

32. On or about and between March 29, 2024, and March 30, 2024, Defendant VARAGIANNIS communicated with Minor Victim 4 ("MV-4"), a 13-year-old minor child, on an encrypted messaging application ("Platform B"), using account Platform B Account-1. In direct messages with MV-4 on Platform B, VARAGIANNIS asked MV-4, "what you want." MV-4 responded, "[a] owner," and "[g]room me." Defendant VARAGIANNIS discussed his "kinks" with

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Your affiant understands that the expression "popped my cherry" refers to the breaking of a girl's hymen, which may occur after a girl losses her virginity or inserts an object into her vagina.

Your affiant understands that "rn" means "right now."

MV-4, including "knife play, gun play, CNC,<sup>9</sup> age play." MV-4 stated, "I'm 12," indicating she was a 12-year-old minor child. MV-4 and VARAGIANNIS made statements during their communications indicating that they were simultaneously communicating over video chat. For example, MV-4 asked VARAGIANNIS, "[c]an you see me?" and VARAGIANNIS responded, "yeah." MV-4 subsequently stated that she had to leave the chat, and the following exchange occurred:

MV-4: We call later?

VARAGIANNIS: we'll see

MV-4: I'll do anything

VARAGIANNIS: cum for me then

MV-4: Rn or later?

VARAGIANNIS: rn

The chat communications indicate that M.W. produced a visual depiction of herself masturbating for VARAGIANNIS over a live video feed:

VARAGIANNIS: good pup

MV-4: Its so big

VARAGIANNIS: faster

MV-4: I cum

VARAGIANNIS: cute

ONC is an abbreviation that stands for "consensual non-consent," which is a form of roleplaying in where participants engage in activities that simulate non-consensual scenarios. 33. During the same conversation, Defendant VARAGIANNIS asked MV-4 if she was busy and stated he was thinking about something. VARAGIANNIS and MV-4 had the following exchange:

VARAGIANNIS: something to do with a marker and server, but its alr<sup>10</sup>

MV-4: Do I have to write 764 on me

VARAGIANNIS: you aren't dumb

MV-4: Wdym<sup>11</sup>

VARAGIANNIS: actually something else

34. After a brief exchange about moving to a different server, they had the following exchange:

VARAGIANNIS: could do something else, actually nvm

MV-4: Tell me

VARAGIANNIS: nah nah don't wanna waste your time, plus ik<sup>12</sup> you shy

MV-4: Baby, tell me

VARAGIANNIS: little strip tease for the server

MV-4: How may ppl.

VARAGIANNIS: only 3

MV-4: Who

VARAGIANNIS: you wouldn't know them

MV-4: R they nice. But I look fat

<sup>&</sup>quot;Alr" is an abbreviation for "alright."

<sup>&</sup>quot;Wdym" is an abbreviation for "what do you mean."

<sup>&</sup>quot;ik" is an abbreviation for "I know."

VARAGIANNIS: not really. You look fine

35. Direct messages between MV-4 and Defendant VARAGIANNIS on Platform B which were exchanged simultaneously with the live show that the Defendant proposed MV-4 perform on Platform B, reveal that Defendant VARAGIANNIS instructed MV-4 to remove her clothes and perform a "strip show" with the sound off so that she would not hear the comments of the Defendant and his associates as they watched her. After the live stream ended, MV-4 stated in direct messages to Defendant VARAGIANNIS, "I want to kms," which is an abbreviation used to mean "kill myself."

#### Minor Victim 5

- 36. On or about June 14, 2024, while acting in concert with Defendants NEPAL and VARAGIANNIS, who were administrators of 764 Inferno and leaders of 764, Co-Conspirator 3 posted a link in 764 Inferno to a channel on Platform A entitled "[Minor Victim 5 ("MV-5")] Lorebook." The Lorebook contained images and videos depicting MV-5 engaged in sexually explicit conduct and self-harm. Specifically, the material contained visual depictions of MV-5 penetrating her naked vagina with her fingers and cutting the names of 764 members into her body. In addition, the Lorebook contained at least one visual depiction of MV-5 showing her exposed breasts and naked torso, with the moniker "NARO" and a symbol that was either cut into her body or written with blood. The material was produced between on or about October 1, 2022, and June 13, 2023, when MV-5 was 13 and 14 years old.
- 37. Co-Conspirator 3 posted MV-5's Lorebook in the 764 Inferno channel twice on or about June 14, 2024. He initially posted the link at 8:25 a.m. PST and then again at 8:46 a.m. PST. Co-Conspirator 3 and other members of 764 Inferno commented about the Lorebook. Another 764

member asked, "what did you say at the end of the vid"? Co-Conspirator 3 responded, "SHE WAS LIKE 'PLEASE STOP' and i Said 'stfu<sup>13</sup> whore' and i kicked her again."

38. Defendant NEPAL was active in 764 Inferno while Co-Conspirator 3 was posting this material. Posting under the moniker "Leather," Defendant NEPAL posted in Inferno five minutes before Co-Conspirator 3 posted the first link to the MV-5 Lorebook. NEPAL posted again17 minutes after Co-Conspirator 3 posted the second link. VARAGIANNIS was likewise active in 764 Inferno, and posted comments in the channel the same day, June 14, 2024, between 7:41 a.m. PST and 7:56 a.m. PST.

#### Minor Victim 6

- 39. On or about June 18, 2024, while acting in concert with Defendants NEPAL and VARAGIANNIS, who were administrators of 764 Inferno and leaders of 764, Co-Conspirator 2 posted a compilation video to 764 Inferno, which included a clip from a known child pornography video called "Daisy's Destruction." The video depicts a toddler ("Minor Victim 6") hung upside from her feet while she is sexually assaulted and tortured by an adult. According to the National Center for Missing and Exploited Children ("NCMEC"), the video is part of a known child pornography series named "Baby with Ice."
- 40. Defendant NEPAL was active in 764 Inferno when Co-Conspirator 2 posted the "Daisy's Destruction" video. Co-Conspirator 2 posted at 3:51 p.m. PST. The last post in 764 Inferno before Co-Conspirator 2's post was a post by Defendant NEPAL stating, "I got some cool shit coming in too;" "I ain't doing it though, I don't do shit." Later the same day, Defendant NEPAL was active in 764 Inferno, communicating with Co-Conspirator 1 and discussing his decision whether to remove others from 764 Inferno for fighting. Posting under the moniker "Leather,"

Your affiant understands that "stfu" means "shut the fuck up."

Defendant NEPAL posted, "Fail [Co-Conspirator 1] let's remove some niggas from here" "I seen some argument."

41. Defendant VARAGIANNIS was likewise active in 764 Inferno on or about June 18, 2024, posting material between 2:44 a.m. PST and 6:52 p.m. PST.

#### Minor Victim 7

- 42. On or about August 29, 2024, while acting in concert with Defendants NEPAL and VARAGIANNIS, who were administrators of 764 Inferno and leaders of 764, Co-Conspirator 2 posted a link to a channel on Platform A, which contained material entitled the "[Minor Victim 7 (MV-7)] Lorebook." The MV-7 Lorebook contained images and videos of 14-year-old minor victim MV-7 engaged in sexually explicit conduct. The material included fan signs for 764-members that were drawn on MV-7's body as well as visual depictions of MV-7 inserting a hairbrush and other foreign objects into her naked vagina. In addition, degrading comments from 764 members made to and about MV-7, were also contained in the Lorebook. The video files in the MV-7 Lorebook include the following:
  - a. One five-second video of MV-7, who appeared naked in the video, repeatedly inserting a purple hairbrush into her vagina.
  - b. One nine-second video of MV-7 repeatedly inserting a foreign object into her vagina.
  - c. One 18-second video captioned "I just fucked myself 2u :3," depicting MV-7 repeatedly inserting a foreign object, which appears to be a pen, into her vagina.
  - d. One 10-second video of MV-7 repeatedly inserting her fingers into her vagina.

#### Minor Victim 2

- VARAGIANNIS, who were administrators of 764 Inferno and leaders of 764, Co-Conspirator 4 posted a link in 764 Inferno to the "[MV-2] Lorebook," which contained visual depiction of MV-2. The link contained a 36-second video showing MV-2 inserting her fingers into her naked vagina and doing cut signs on a live chat on Platform A. MV-2 stated during a December 2024 interview with the FBI that she was aware of her Lorebook and that she had sent nude images of herself online as recently as November 2024, when she was 15 years old. She acknowledged that she participated in a cut-show on at least one occasion after someone had threatened to release her private messages and images if she did not comply.
- 44. Defendant NEPAL, using moniker "Trip-Eeeeeeeee Ee," was active in 764 Inferno on or about August 29, 2024, when Co-Conspirator 2 posted the CSAM depicting minor victim MV-7 and when Co-Conspirator 4 posted the CSAM depicting minor victim MV-2.
- 45. Defendant VARAGIANNIS was also active in 764 Inferno on or about August 29, 2024, posting both on August 29, and the next day, August 30, 2024.

#### Minor Victim 8

46. On or about August 31, 2024, at 2:12 a.m. PST, while acting in concert with Defendants NEPAL and VARAGIANNIS, who were administrators of 764 Inferno and leaders of 764, Co-Conspirator 4 posted a link in 764 Inferno to the "[Minor Victim 8 (MV-8)] Lorebook." The Lorebook contained visual depictions of a U.K.-based minor victim inserting her fingers into her naked vagina on a Platform B livestream. On or about September 4, 2024, additional content was posted to the MV-8 Lorebook channel, which contained visual depictions of a minor female engaging in masturbation with a foreign object. In the video depictions, MV-8's naked body is

exposed to the camera, revealing that she is small in bone structure, with narrow hips and no visible public hair, supporting the inference that she is a minor.

- 47. The files in the Lorebook include the following:
  - a. Three images of the minor with cuts across both breasts, and the word "Praise,"
     Co-Conspirator 4, written across her breasts in blood and marker.
  - One 44-second video of the minor inserting her fingers into her vagina repeatedly.
- 48. On or about August 31, 2024, Defendant VARAGIANNIS was listed on a roster of 764 Inferno members. The MV-8 Lorebook was posted three hours after VARAGIANNIS posted a comment to the group.

## **IDENTIFICATION OF THE DEFENDANTS**

## **Identification of Defendant NEPAL**

- 49. According to a third-party commercial subscription service, on or about May 18, 2022, a Platform A account with the display name "Trippy ~^\*Inferno\*^~" ("Platform A Account-1") instructed other users to "add [him] on [another encrypted application ("Platform C")]" through the username "freekickking7" ("Platform C Account-1").
- Account-1, which was created on or about June 6, 2017. The subscriber information also included multiple display names utilized by Platform C Account-1, some of which were "Prasan-Tripp", "PrasanTrippKing", and "Trippy 7Six4." The subscriber information also included IP addresses by which Platform C Account-1 was accessed, one of which was used numerous times in or around and between January 2022 and January 2024 (IP Address-1"). Based

on open-source information, IP Address-1 belongs to an internet-connected device in or around High Point, North Carolina.

- 51. Records provided by Lumos Networks ("Lumos") included subscriber information for two specific instances in which IP Address-1 was used to access Platform C Account-1. The subscriber information revealed that the associated internet service provider account was registered to an individual with the last name Nepal and included a specific service address in High Point, North Carolina ("Residence-1"). Based on public information, four individuals were associated with Residence-1, including PRASAN NEPAL, with a date of birth of February 24, 2005. The other three individuals who resided at Residence-1 are NEPAL's parents and younger sister.
- 52. Platform C records include photographs of an individual who is a visual match to NEPAL's driver's license photograph. Therefore, I believe NEPAL to be the user of the accounts described herein.
- 53. Review of additional Platform A records indicated that Defendant NEPAL also utilized display name "King" and the username "@KrampusE" ("Platform A Account-2"). In or around February 2024, an online covert employee ("OCE-1") captured messages from the 764-associated chatroom "764 Hell Room," where a user with display name "hinder" referred to Platform A Account-2 as "trippy."
- 54. Additionally, on or about February 14, 2024, Platform A Account-2 posted in another 764 channel, the following, "If people know I am Trippy and I don't give a fuck it means I'm not avoiding anything."
- 55. In or around February 2024, OCE-1 captured a group discussion within another 764-related chat that Trippy participated in. The participants discussed moving the chat to a different communication application ("Platform D"). On or about February 28, 2024, OCE-1

observed an account with the username "King Krampus" on Platform D ("Platform D Account-1"), similar to the Platform A Account-2.

- 56. Records obtained from Platform D revealed an email address ("Google Account-1") was associated with the account. Records provided by Google LLC ("Google") for Google Account-1 indicated the recovery email address for Google Account-1 was prasanlegend7@gmail.com and was accessed from IP Address-1 numerous times between 2023 and 2024.
- 57. Based on the foregoing information, your affiant has probable cause to believe that NEPAL is the user of Platform A Accounts-1 and 2 and associated accounts.

#### <u>Identification of Defendant VARAGIANNIS</u>

- 58. According to reporting from a sensitive source, War was a member of the 764 Inferno channel and used Platform A UID X0446.
- 59. According to a third-party commercial subscription service, from at least on or about January 30, 2024, through May 15, 2024, UID X0446 used username "War764."
- 60. Platform B records revealed that a Platform B account ("Platform B Account-1") also used the moniker War764.
- 61. Platform B provided voluntary disclosures that between on or about November 1, 2023, and March 17, 2024, three separate accounts with display name "War764" attempted to coerce at least three minors to commit acts of self-harm. According to the Platform B disclosures, one of the "War 764" accounts was Platform B Account-1, and was associated with email address mercyisweak11@skiff.com. As described above, Platform B Account-1 was also the account in communication with MV-4. The email addresses associated with the other two accounts were bandypapaduck@skiff.com and leznude783@yfaz.com.

- 62. Platform B records further revealed that the three accounts associated with War764 were all accessed from IP addresses resolving to Cosmote, Thessaloniki, located in Central Macedonia. Based on my training and experience, the Platform B disclosures cited above, and the fact that the three accounts were each accessed from the same location, it is likely the accounts are used by the same individual.
- 63. Records obtained from Google reveal email address bandypapalion@gmail.com was registered under the name "War" and was associated with the YouTube channel for @mercyisweak and phone number X6366.
- 64. On or about April 5, 2024, Greek law enforcement seized from Defendant VARAGIANNIS, who resided in Thessaloniki, Greece, multiple electronic devices that were shared with the FBI pursuant to a Mutual Legal Assistance Treaty.
- 65. A review of the Android device seized from Defendant VARAGIANNIS ("Android Device"), with associated phone number X6366, revealed an exchange that included an image of a passport issued under the name LEONIDAS VARAGIANNIS. Records obtained from Google for the account bandypapalion@gmail.com revealed the same passport image of VARAGIANNIS.
- 66. Further review of the Android Device revealed three saved images of graffiti on a white SUV, which included the names "Trippy," "War," and "T3n\_mm." All three images were observed in 764 x NLM HELL ROOM on Platform A, accompanied by the message "if interested in joining us contact me on Platform E @mercyisweak."
- 67. The Android Device also contained an image of graffiti on a white, box-style truck of the words "War," "Fail," "Darks," and "764x Mourge" ("Image 1"). An additional image depicted what appears to be a white male wearing a dark-colored jacket with the hood up, and a skull mask covering his nose and mouth ("Image 2").

68. These images were posted within 764 Inferno by user "WAR 764." Specifically, on or about March 4, 2024, the following messages were exchanged,

Trippy: "War"

Trippy: "Drop morgues paint so the gang can see"

WAR 764: [Posted an image of graffiti on a white, box-style truck, depicting the letters NLM and a swastika and Image 1.]

WAR 764: "he will get more"

WAR 764: "I think he should be joining us soon tho"

WAR 764 was denoted as an "admin" when sending the messages above. The profile picture for WAR 764 was Image 5.

- 69. Records from Platform B associated with Platform B Account-1 revealed all six images discussed above.
- 70. It is common within the 764 network for the same individual to use multiple alternate accounts, called "alts," because accounts often are terminated due to violations of the online platform's community standards, including sharing CSAM, animal crush, or other violent content. Individuals often create alts that are variations of the same name.
- 71. Based on the above, there is probable cause to believe VARAGIANNIS is the user of the accounts associated with the display names, among others, "War764," "War," and "W" on Platform A, and Platform B Account-1.

#### **CONCLUSION**

72. Based on the facts, your affiant respectfully submits that there is probable cause to believe that Defendants NEPAL and VARAGIANNIS committed the offense of Child Exploitation Enterprise in violation of Title 18, United States Code, 2252A(g).

Special Agent Andrew Rust Federal Bureau of Investigation

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on April 15, 2025

HONORABLE ZIA M. FARUQUI UNITED STATES MAGISTRATE JUDGE