

AFM:NJM/MND
F. #2025R00463

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

CORNELIUS SHANNON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Christopher Powell, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between May 2025 and May 2026, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CORNELIUS SHANNON, in interstate or foreign commerce, did use one or more interactive computer services to knowingly and intentionally publish one or more digital forgeries of identifiable individuals, to wit: Victim 1, Victim 2, Victim 3, Victim 4, Victim 5, Victim 6, Victim 7, Victim 8, and Victim 9 (collectively, the "Victims"), the identities of whom are known to the affiant, where such digital forgeries depicted material that was not voluntarily exposed by the Victims in a public or commercial setting, nor a matter of public concern; and the publication

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT

(47 U.S.C. § 223(h); 18 U.S.C. §§ 2, 3551 et
seq.)

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of such digital forgeries was (a) without the consent of the Victims and (b) caused, or intended to cause, harm to the Victims, including psychological, financial, and reputational harm.

(Title 47, United States Code, Section 223(h)(3)(A); Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2021. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for cybercrime, financial crime, and money laundering. I have investigated and otherwise participated in numerous matters during the course of which I have conducted physical surveillance, interviewed witnesses, executed court-authorized search warrants, and used other investigative techniques to secure relevant information. I am familiar with the facts and circumstances set forth below from my participation in the investigation; from my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

Background on Artificial Intelligence Models as Applied to Pornographic Images

2. An artificial intelligence ("AI") model is software, electronic files, or a tool that has been developed using machine learning to undertake a specific task or range of tasks. Each model is trained using large datasets to specialize in its assigned task. AI models capable of creating photorealistic images or videos, including images or videos depicting real

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

people, have rapidly advanced in recent years. For example, individuals can use AI models to create “deepfakes,” in which an AI model digitally alters the image of a real person, making it appear as though that individual said or did something that they did not actually say or do. Individuals can also generate entirely new photorealistic images or videos of an identifiable individual using text-based prompts.

3. During the investigation, I have seen that individuals are using AI tools to generate realistic-looking pornographic materials, including materials that depict real-world people. Some, but not all, of the people whose images appear in the AI-generated pornographic material are public figures. Based upon a review of publicly available websites, I assess that individuals have been publishing and/or selling AI-generated images and videos depicting real world people (i) naked, or in various stages of undress, and/or (ii) engaging in sexually explicit conduct.

Background on the Take it Down Act

4. The Tools to Address Known Exploitation by Immobilizing Technological Deepfakes On Websites and Networks Act, also known as the “Take It Down Act,” Pub. L. 119-12, was enacted into law in May 2025. The Take It Down Act was intended, *inter alia*, to combat (i) so-called “revenge porn,” or pornography posted of an intimate partner contrary to the partner’s wishes, and (ii) nonconsensual digital forgeries, or materials created to simulate a real person that either are not genuine images of the person, or depict the person in contexts that are computer-generated or altered. *See generally* Darlene Superville, *Trump Signs Take It Down Act, Bill Combating Nonconsensual Deepfakes and Revenge Porn*, Associated Press, May 19, 2025, available at <https://www.pbs.org/newshour/politics/watch-live-trump-signs-take-it-down-act-bill-combating-nonconsensual-deepfakes-and-revenge-porn> (last accessed May 11, 2026).

5. The Take It Down Act includes a number of prohibitions regarding the intentional disclosure of nonconsensual intimate visual depictions. *See generally* 47 U.S.C. § 223(h). It includes prohibitions on nonconsensual posting of real images under certain circumstances not relevant here. *See, e.g.,* 47 U.S.C. § 223(h)(2). It also includes, as relevant here, prohibitions regarding digital forgeries:

a. First, it prohibits use of an interactive computer service to knowingly publish a digital forgery of an identifiable adult if (i) it is published without the adult's consent; (ii) it is not voluntarily exposed by the adult in a public or commercial setting; (iii) it is not a matter of public concern; and (iv) if it is intended to cause harm or actually causes harm, including psychological, financial, or reputational harm. 47 U.S.C. § 223(h)(3)(A).

b. Second, it prohibits publication of digital forgeries involving children with intent to abuse or humiliate the minor, or to "arouse or gratify the sexual desire of any person." 47 U.S.C. § 223(h)(3)(B).

c. A digital forgery is defined to include "any intimate visual depiction of an identifiable individual created through the use of software, machine learning, artificial intelligence, or any other computer-generated or technological means, including by adapting, modifying, manipulating, or altering an authentic visual depiction, that, when viewed as a whole by a reasonable person, is indistinguishable from an authentic visual depiction of the individual." 47 U.S.C. § 223(h)(1)(B).

6. Congress's legislative findings in connection with the Take It Down Act emphasized that publishing AI-generated intimate images "harms the real people depicted, including psychological harm such as humiliation, public shaming, and depression, as well as

physical harm such as self-harm and suicide.” H.R. Rep. No. 119-82, at 2-3 (2025). The findings further note that online circulation of such images magnifies that harm. *Id.*

The Defendant’s Publication of AI Pornographic Material

7. On or about February 19, 2026, law enforcement officials visited an image- and video- sharing internet platform designed for creators to upload and share adult and explicit content (the “Porn Website”). Upon visiting the Porn Website, law enforcement officers identified an account [REDACTED] publishing explicit, AI-generated content. As discussed below, there is probable cause to believe that this account belongs to the defendant CORNELIUS SHANNON, and it is hereafter referred to as the “Shannon Account.”

8. Evidence demonstrating that the Shannon Account belongs to SHANNON includes a profile picture of the Porn Website user. *See* Fig. 1 below. Based on my review of other photographs of SHANNON, including Department of Motor Vehicles records and surveillance photographs taken by law enforcement officers of SHANNON on or about April 16, 2026 (*see* Fig. 2 below), the individual depicted in the profile picture for the Shannon Account appears to be SHANNON.

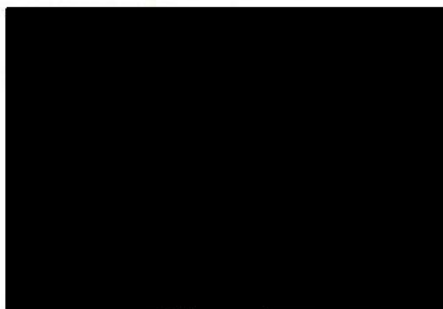
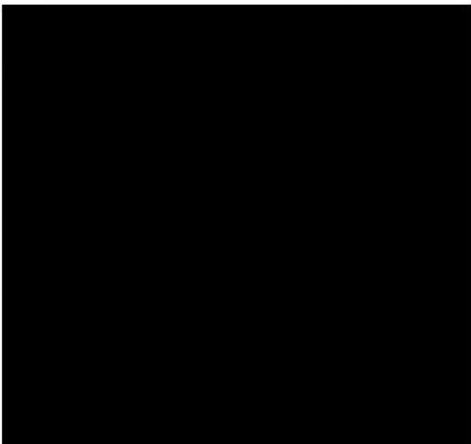


Figure 1



Figure 2

9. In addition, law enforcement officers identified [REDACTED] with the [REDACTED] as the Shannon Account. [REDACTED] account includes a profile picture of an individual that also appears to be SHANNON. *See* Fig. 3.

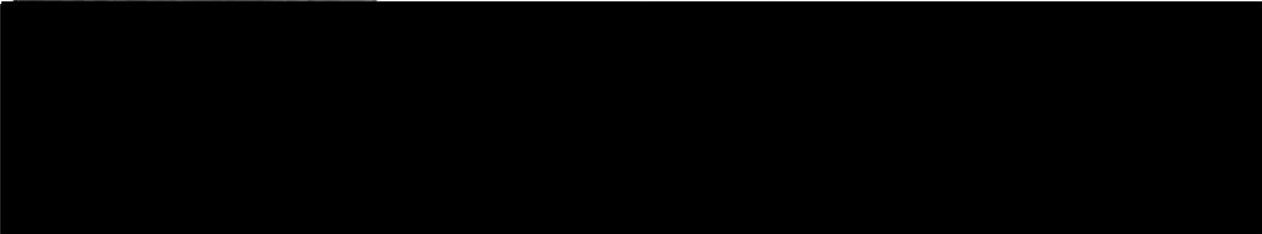


10. [REDACTED] indicate that the email address associated with the [REDACTED] account is [REDACTED]@gmail.com. Records from Google confirm that the subscriber for [REDACTED]@gmail.com is “Neil Shannon,” which I understand to be a nickname for the defendant Cornelius Shannon. Further, I have reviewed multiple publicly available posts on [REDACTED] account where the user identifies himself as “Cornelius Shannon.”² In addition, [REDACTED]

[REDACTED]

[REDACTED]

11. On or before February 19, 2026, the Shannon Account had uploaded and published approximately 273 albums of content to the Porn Website. As further discussed below, at least 240 of those albums contained explicit, AI-generated content of identifiable female individuals, including politicians, actresses and musicians. At that time, the profile page for the Shannon Account reflected that the content published on the Shannon Account had been viewed approximately 2.1 million times.



12. On or about April 17, 2026, from a location in Brooklyn, New York, law enforcement officials again reviewed and captured the content of the Shannon Account. Between February 19, 2026, and April 17, 2026, SHANNON had published an additional 87 additional albums to the Shannon Account, which predominantly contained AI-generated explicit content of female public figures. In total, on April 17, 2026, there were approximately 360 albums published on the Shannon Account, which contained AI pornographic material of approximately 90 different female victims. The Shannon Account profile page reflected that the content had been viewed approximately 2.4 million times.

13. The 360 albums published on the Shannon Account included AI-generated videos and/or photographs appearing to depict the nine Victims described below. The identities of Victims 1 through 9 are known to the affiant. I believe that the videos appearing to depict each of the nine Victims, described in further detail below, were generated using AI, in part because the titles of albums containing these materials, and/or the hashtags displayed underneath the videos, reflect that the materials are AI-generated. Throughout my review of the Shannon Account, there is no indication that SHANNON published any of the AI-generated explicit content with the consent of any of the individuals depicted in the AI-generated explicit conduct.

Victim 1

14. Since May 19, 2025, SHANNON has published at least three AI-generated videos appearing to depict Victim 1, a female political figure [REDACTED] [REDACTED], on the Porn Website. The AI videos depict Victim 1 either engaging in sexually explicit conduct, or in various stages of undress. There is probable cause to believe that the digital forgeries are depictions of Victim 1 because the titles of the videos reference Victim 1's name. For example, one video appears to depict Victim 1 with her hands lifting her shirt to

expose her breasts. The video is titled in part “[Victim 1’s widely adopted public nickname] ai” and has the hashtags “[Victim 1’s nickname] #AI #Deepfakes.” This video has been viewed approximately 16,700 times and has been re-posted in other locations on the Porn Website eight times. There is another AI-generated video appearing to depict Victim 1 removing her clothing, which is titled in part “[Victim 1]_ai” and has been viewed approximately 9,500 times and re-posted three times. Another Porn Website user commented under the video, “[REDACTED].”

Victim 2

15. Since May 19, 2025, SHANNON has published at least one AI-generated video appearing to depict Victim 2 on the Porn Website. Victim 2 is a female political figure. There is probable cause to believe that the digital forgery depicts Victim 2 because the title of the video references Victim 2’s name. The video of Victim 2 is titled “[misspelling of Victim 2’s last name]_AI_BJ,” followed by a long alphanumeric string, and it appears to depict Victim 2 wearing a suit and performing oral sex on a man. The video has been viewed approximately 13,600 times and has been re-posted in other locations on the Porn Website seven times.

Victim 3 and Victim 4

16. Since May 19, 2025, SHANNON has published at least one AI-generated video appearing to depict both Victim 3 and Victim 4 on the Porn Website. Victim 3 and Victim 4 are female entertainment figures. There is probable cause to believe that the digital forgery depicts Victim 3 and Victim 4 because the title of the video contains Victim 3’s name, and Victim 3 and Victim 4 are frequently associated. The album containing this video published on the Shannon Account is titled in part “[Victim 3 first name]_AI_BJ” and depicts Victim 3 and Victim 4, both with their breasts exposed, performing oral sex on two men. The album also contains still images of the sexually explicit AI-generated video. The material in the

album has been viewed nearly 8,000 times and has been re-posted in other locations on the Porn Website twice.

Victim 5

17. Since May 19, 2025, SHANNON has published at least five AI-generated videos of Victim 5 on the Porn Website, which appear to depict Victim 5 engaging in sexually explicit conduct. Victim 5 is a female entertainment figure. There is probable cause to believe that the digital forgeries depict Victim 5 because the titles of the videos contain Victim 5's name. For example, there are two videos depicting Victim 5 performing oral sex on a man, with one video having the hashtags "#AI #deep fakes . . . #blowjob #[Public Figure 3] blowjob." The video has been viewed over 21,000 times.

Victim 6

18. Since May 19, 2025, SHANNON has published at least 30 AI-generated videos of Victim 6 on the Porn Website appearing to depict Victim 6 engaging in sexually explicit conduct. Victim 6 is a female entertainment figure. Materials depicting Victim 6 on the Shannon Account have been viewed over 300,000 times. There is probable cause to believe that the digital forgeries depict Victim 6 because the titles of the videos often contain Victim 6's name. For example, there is a video appearing to depict Victim 6 performing oral sex on a man that is titled in part "[Victim 6 last name]_ai_blowjob." The video has been viewed over 68,000 times and has been shared 39 times. Other Porn Website users have posted comments under the video including [REDACTED] and [REDACTED]. In addition, there is a video titled in part "[Victim 6]_ai," which depicts an AI-generated version of Victim 6 having sexual intercourse, which has over 34,000 views and has been reposted 13 times. Another video titled in part "[Victim 6]_ai" depicts Victim 6

completely naked and having sexual intercourse, which has been viewed over 25,000 times.

Other AI-generated videos of Victim 6 published on the Shannon Account include videos titled in part “[Victim 6]_ Ass_AI_,” “[Victim 6]_AI_tits_” and “[Victim 6]_aI_titfuck_.”

Victim 7

19. Since May 19, 2025, SHANNON has published at least 17 AI-generated videos of Victim 7 on the Porn Website appearing to depict Victim 7 engaging in sexually explicit conduct. Victim 7 is a female entertainment figure. Material depicting Victim 7 published on the Shannon Account has been viewed over 82,000 times. There is probable cause to believe that the digital forgeries depict Victim 7 because the titles of the videos and/or the hashtags underneath the videos often contain Victim 7’s name, or widely adopted nickname. For example, there is a video purporting to depict Victim 7 naked performing oral sex. The video includes the hashtags “[Victim 7 #AI #BJ . . . #blowjob.” The video has been viewed approximately 9,900 times.

Victim 8

20. Since May 19, 2025, SHANNON has published at least 17 AI-generated videos of Victim 8 on the Porn Website appearing to depict Victim 8 engaging in sexually explicit conduct. Victim 8 is a female entertainment figure. Material depicting Victim 8 published on the Shannon Account has been viewed over 113,000 times. There is probable cause to believe that the digital forgeries depict Victim 8 because the titles of the videos often contain Victim 8’s name, or widely adopted nickname. For example, there is a video titled in part “[Victim 8’s abbreviated name]_ai_cumshot.” The video purports to depict Victim 8 with her breasts exposed engaged in sexually explicit conduct. The video has been viewed over 4,500 times. Another video titled in part “[Victim 8’s abbreviated name]_tits_cock_suck”

purports to depict Victim 8 performing oral sex. The video has been viewed approximately 7,800 times.

Victim 9

21. Since May 19, 2025, SHANNON has published at least one AI-generated video of Victim 9 on the Porn Website, which appears to depict Victim 9 engaging in sexually explicit conduct. Victim 9 is a female entertainment figure. There is probable cause to believe that the digital forgery depicts Victim 9 because she is readily identifiable in the video. The video is titled in part “aI_pussy_eating” and depicts AI-generated versions of female victims, including Victim 9, Victim 5, and others performing oral sex on other women. The video has been viewed 10,900 times.

Harm Caused by Publication of AI Pornographic Material

22. Based on my conversations with multiple victims who have had AI-generated pornographic material purporting to depict them published by SHANNON on the Shannon Account and/or their representatives, and conversations with other victims who have had AI-generated pornographic material purporting to depict them published on the Porn Website, my review of the Congressional legislative findings in connection with the Take It Down Act, and my review of the digital forgeries that SHANNON published, I believe that publication of non-consensual digital forgeries appearing to depict identifiable individuals in

intimate settings generally causes harm to those depicted. For example, women whose likenesses are contained in such forgeries have described, among others, the following harms:

a. The loss of dignity inherent in the idea that someone else can manipulate their images, and cause them to appear to engage in degrading behavior, for the profit or pleasure of the manipulator;

b. Psychological, emotional, and reputational harms attendant to knowing that materials depicting oneself engaged in sexual activities are widespread, such that the person depicted has no assurance that the people with whom she is interacting have not viewed the degrading images;

c. Psychological, emotional, and reputational harms associated with the concern that the family of the person depicted might encounter the offending material, and uncertainty regarding how to explain that material to relatives, particularly young relatives;

d. For victims whose depictions are premised on images created when they were minors, psychological and emotional harm associated with the idea that images depicting their sexual abuse as a child are circulating for the profit of others;

e. Reputational and financial harms including potential lost business opportunities and/or diminished asking price for business opportunities, associated with the shift in the public perception of an individual apparently depicted in widely available and highly explicit sexual content;

f. Financial harms attendant to the loss of potential business should the individual depicted choose to capitalize on her sexuality herself, either through pornography or through a non-pornographic but sexualized presentation in another medium, which might

prove less lucrative if materials apparently depicting the individual in substantially more sexualized media is readily available; and

g. Financial harms attendant to hiring a private company to identify and locate digital forgeries containing intimate visual depictions and to engage with service providers to remove it from the internet.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant CORNELIUS SHANNON, so that he may be dealt with according to law.

It is further requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant except that the undersigned will distribute copies of this charging document and any resulting arrest warrant to other law enforcement authorities as necessary to effectuate the defendant's arrest. Based on my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the

investigation, including by giving the defendant an opportunity to flee, destroy or tamper with evidence, intimidate witnesses or change patterns of behavior.


Christopher Powell
Special Agent, Federal Bureau of Investigation

Sworn to before me this by telephone
15th day of May, 2026


THE HONORABLE CLAY H. KAMINSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK