

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JAMES FLORENCE, JR.

Defendant

CRIMINAL No. 25-cr-10024-RGS

AGREED UPON STATEMENT OF FACTS

The defendant James Florence, Jr. ("FLORENCE" or "Defendant") admits the allegations charged in the eight-count Information charging him with and he understands that, the nature of the charges to which the plea is offered involves proof that FLORENCE committed the crimes of seven-counts of Cyberstalking, in violation of 18 U.S.C. § 2261A(2)(B), and one-count of Possession of Child Pornography in violation of 18 U.S.C. 2252A(a)(5)(B), as follows:

**OVERVIEW**

1. From in or about January of 2014 through September 11, 2024, FLORENCE engaged in an extensive cyberstalking campaign targeting Victim 1 and those associated with her. During the same timeframe (*in some cases going back to 2008*), FLORENCE also engaged in separate cyberstalking activity aimed at other victims. FLORENCE used a variety of techniques and methods to harass and intimidate his victims and others in the community, including making fake nude images of the victims, doxing or exposing victims' personal information, creating vulgar fake accounts in the victims' names, and accessing online accounts without authorization (i.e. "hacking") the victims' accounts.

2. FLORENCE's cyberstalking campaigns included:

- obtaining-and then widely distributing-private information about the victims, which included private photographs or photographs shared amongst friends on social media. These photographs were frequently doctored to appear sexual or pornographic in nature;
- accessing online accounts without authorization;
- creating accounts in the name of his victims and soliciting fantasy sexual encounters on their behalf, and in the case of one victim, those fabricated sexual encounters included building a profile of that victim on an interactive platform, which included information about the victim's apparent preference for G-strings and thongs, that she was sexually adventurous, used sex toys and had a sex swing in her home, and listed her actual home address;
- posing as his victims by creating impersonation accounts in their names and then posting or sending various harmful content from those accounts;
- encouraging others to extort, shame, defame, and intimidate victims for pornographic material; and
- stealing victims' underwear and using photos of the underwear to both harass those victims or engage with others on the internet to further mutual sexual fantasies.

3. FLORENCE employed a number of techniques to hide his identity online, for example, by using Virtual Private Network ("VPN") services; using anonymous overseas "revenge porn" websites; and using foreign encrypted email providers that do not respond to United States law enforcement and/or do not maintain IP logs or other records.

4. FLORENCE has significant knowledge of and experience with computers and was previously employed at software companies, as well as at an emerging technology organization, performing work for the United States government.

#### **VICTIM 1**

5. In late 2017, FLORENCE posted an advertisement, which included a photograph of Victim 1's underwear on Craigslist, in a section of the website soliciting casual sexual encounters. The advertisement was created to look as if it was posted by Victim 1.

6. At some point in 2020 or prior to 2020, FLORENCE created several Twitter accounts and used them to send Victim 1 the same photos of her underwear, claiming to be in

possession of them. FLORENCE also created another account that included Victim 1's first name and "32DD" which he used to post photos of the underwear. FLORENCE used those accounts to "tag" Victim 1's real Twitter account to those vulgar tweets, which meant that the (underwear tweets, etc.) were directly linked to the Victim's twitter account. The Victim had to delete her twitter account as a result.

7. At some point in February 2023 or prior to February 2023, FLORENCE posted images of Victim 1 on the website [www.ladies.exposed](http://www.ladies.exposed). Images included a variety of photo collages that included images that had been edited to make Victim 1 appear to be nude or semi-nude, and included a photo of Victim 1's actual driver's license, Victim 1's then true phone number, true email addresses, true home address, a photo of Victim 1's then current residence, and Victim 1's professional information. Captions of the uploaded images included "Own & Share [Victim 1] – Make This Whore Famous", "Humiliate & Share Webslut [Victim 1]", and "Fully Exposed Webslut [Victim 1]. Post & Share Her Everywhere. Make The Whore Famous".

8. As a result of these postings, messages were sent to Victim 1 via email and text message by unknown individuals. These emails included threats to disseminate Victim 1's images to coworkers and/or students if she did not comply with the senders' demands, which included a demand that she produce sexual images.

9. In May of 2023, FLORENCE posted Victim 1's personal information, including personal email addresses, home address, professional contact information, account passwords, and even a list of hair colors Victim 1 has dyed her hair, on publicly accessible websites.

10. Between June of 2023 and April of 2024, FLORENCE created at least seven Reddit accounts utilizing Victim 1's name and images. At least three of the Reddit accounts posted digitally altered images depicting Victim 1 as nude or semi-nude. FLORENCE posted a

photo of Victim 1's driver's license (with information such as her address) and included the message "Accept It Your Exposure Is Permanent Slut" in the biography section of the user profile. This same Reddit account also posted a section titled "Fan Tributes" consisting of eight photos of erect penises in front of a digital image of Victim 1. The section ended with the statement "Enjoy Your Exposure You Naughty Bimbo. You Belong To The Internet."

11. Victim 1's name, image, and personal information was also used by FLORENCE to create at least three artificial intelligence-driven chatbots on two different platforms between approximately September of 2023 and July of 2024. The chatbots were programmed with Victim 1's personal and professional information which would then inform the chatbot on how to respond to users during a chat. By way of example, if another user interacting with the chatbot asked the "Victim 1" profile, created by FLORENCE, where she lived, the chatbot could provide Victim 1's true home address followed by "Why don't you come over?"

12. Victim 1's images, including images altered to make Victim 1 appear nude or semi-nude, were posted by FLORENCE to numerous photo-sharing and/or pornography platforms where users could view, download, and/or comment on the images. On one particular website, users posted comments such as "Mmmmm sizzling hot piss and cum target" and "Follow me to the toilets and show me your big tits! Then get on your knees and suck my cock before I bend you over and fuck you against the toilet door! As a cheap whore!"

13. FLORENCE posted Victim 1's name, image, and/or other personal information on at least 15 websites. At least 30 unique accounts were used by FLORENCE to harass, impersonate, or otherwise cause Victim 1 substantial emotional distress. To date, Victim 1 has received dozens of distressing text messages, emails, or calls from unknown senders addressed to Victim 1 discussing her image and information posted online through August of 2024.

14. On Wednesday, September 11, 2024, following the execution of a federal search warrant at FLORENCE's residence, federal agents located dozens of pairs of women's underwear in multiple places in the home, including underwear believed to belong to Victim 1. The FBI also identified a cell phone case displaying an image of Victim 1 in a bikini among the underwear.

15. Federal agents also located and then forensically examined numerous digital devices. Numerous photos of Victim 1, including the image printed on the cell phone case and others used in impersonation and harassment accounts, and photos of Victim 1's underwear were found on FLORENCE's Pixel 6 Pro mobile device in a Dropbox account belonging to FLORENCE. Screenshots from FLORENCE's Snapchat account showed his account's "My AI", which is a chatbot on Snapchat that uses artificial intelligence to answer questions, make recommendations, and help with other tasks, bore a striking resemblance to Victim 1 in a particular image she posted on her own social media accounts that was ultimately used by FLORENCE in several harassing accounts. Passwords associated with Victim 1 were also found in a text file on FLORENCE's desktop computer.

16. During that forensic review agents identified at least an additional six victims who were victimized by FLORENCE.

17. Furthermore, agents recovered 62 images and four videos of child pornography in a folder labeled "FF Models\Sandra" on FLORENCE's Seagate hard drive. The images and videos depicted females between the ages of approximately eight and fifteen years of age.

#### **VICTIM 2**

18. In or around 2011, FLORENCE created a Facebook account using Victim 2's name and likeness. The account appeared to be a copy of Victim 2's true Facebook account at that time. Shortly after becoming aware of this duplicate account, Victim 2 began receiving

messages on Facebook from men she didn't know. These accounts sent Victim 2 photographs of her own underwear.

19. In or around 2013, FLORENCE created a MySpace account and posted nude, explicit or provocative photographs of Victim 2, which depicted Victim 2's face on other women's bodies. A few months later, a friend of Victim 2 notified her of a Facebook account, which FLORENCE had created, which had posted numerous photographs of Victim 2's face on various bodies, including images depicting nudity; there were approximately 20 different profile photos of her associated with this account. All of the photos that were explicit, nude, or semi-nude, contained Victim 2's true face on another person's body. The account also contained personally identifying information about Victim 2, including her name and high school.

20. In addition to Facebook, FLORENCE posted photos of Victim 2, including digitally altered photos of her to make her look provocative or sexualized, on other websites on the internet, including Classmates.com, which was still active and visible as of December 2024.

21. In and around 2013, FLORENCE added (friended) the accounts of other classmates and friends of Victim 2 using the false Facebook account, which included images depicting Victim 2's face on the nude bodies of other women. This act made the content of that account available to the friends and classmates of Victim 2. Victim 2 was regularly teased and harassed at school by others who had seen the explicit photos.

22. On May 26, 2018, FLORENCE reached out to Victim 2 on Facebook using a profile with a false name and photo, asking her if she was accepting payment for Snapchat photos or her underwear. Using the same false account, FLORENCE sent another message to Victim 2 in October of 2020 stating, "let me pay to see that body [Victim 2]".

23. In February of 2021 and continuing until at least July 21, 2022, FLORENCE communicated with Victim 2 through a different false account on Facebook. These messages contained at least one photo of Victim 2's underwear. The photo was accompanied by messages like "this thong look familiar, [Victim 2]?", "i love your panties, [Victim 2]", and " I have 2 more pairs too".

24. During the execution of the search warrant at FLORENCE's residence, agents located underwear which was believed to belong to Victim 2. In addition, numerous explicit photos featuring Victim 2's face on the body of other women were located on a Seagate hard drive found in FLORENCE's home.

### **VICTIM 3**

25. In or around of the end of 2008 or the beginning of 2009, FLORENCE contacted Victim 3, who was approximately 15 years old at the time, utilizing a MySpace account with the username "ilove [Victim 3]". The MySpace account contained photos of Victim 3, which were not explicit but nevertheless made her uncomfortable. FLORENCE used the account to anonymously message that he had "feelings" for Victim 3.

26. Approximately one year later, Victim 3's password for her Myspace account was changed without her knowledge and she was locked out of her account. At about the same time, FLORENCE compromised Victim 3's AOL account. Victim 3's AOL instant messenger account was changed to list "sensual message" under her name in the bio. The account also contained a link to a MySpace account with explicit photographs of Victim 3, which depicted her face on numerous provocative, nude, or semi-nude images.

27. In March 2010, FLORENCE created an account with a username that Victim 3 had previously used. This account also used an image of Victim 3 as the profile picture on the photo sharing website Flickr. The account contained over 112 images of Victim 3, most of them

were provocative in nature and three of which included the text “JAILBAIT.” The account also displayed a photo of underwear laid out on a bed with the text “STOLEN JAILBAIT PANTIES” and “She knows they’re missing.” The Flickr account contained a link to the website [Victim 3 first and middle names].

28. In April or May of 2012, when Victim 3 was a senior in high school, Victim 3 became aware of an impersonation account in her name on Facebook. This account had been created by FLORENCE. This account publicly listed her address and phone number and included altered explicit, nude, or semi-nude photos of Victim 3. Victim 3 endured persistent sexual harassment as a result of these postings. At or near this same time, FLORENCE also took control of Victim 3’s actual Facebook account, which he continued to access and utilize as late as November of 2022.

29. In 2013, FLORENCE took over Victim 3’s YouTube account. FLORENCE subsequently posted an altered photo depicting Victim 3’s face on a female body wearing only a t-shirt and underwear. During this same period of time, Victim 3 was informed by a family friend that an image of her, which was altered to appear as if she had semen on her face, had been posted on the internet. FLORENCE created impersonation accounts in Victim 3’s name on multiple platforms like OkCupid, Twitter, Gmail, Yahoo, AOL Instant Messenger, and Facebook, some of which were active recently as May of 2024. However, the Twitter account is still publicly viewable on the platform as of February 2025, Twitter has denied a request made on behalf of VICTIM 3 to take down this account.

30. Between 2017 and 2024, FLORENCE engaged in Google searches, including image searches, involving Victim 3’s full name with the terms “nude”, “xxx”, “jailbait”, “15 yr



old photo gallery” and “teen queen”. FLORENCE also had notifications set up to notify him of any biographical changes associated with Victim 3 on a data aggregating website.

31. During the execution of the search warrant at FLORENCE’s residence, agents recovered underwear believed to belong to Victim 3 in FLORENCE’s home. Agents also located several of the provocative images of Victim 3 that were posted to the internet by FLORENCE, along with additional digitally altered images of Victim 3, which put her face on nude or semi-nude bodies.

#### **VICTIM 4**

32. In September of 2011, FLORENCE emailed himself at least three images of Victim 4, which had been altered to depict Victim 4’s face on other women’s nude, or semi-nude, bodies.

33. In December of 2011, FLORENCE created a Classmates.com account in the name of Victim 4, which was ultimately terminated by the site administrator for posting “inappropriate photos”.

34. Sometime in 2011, FLORENCE took over Victim 4’s Facebook account and posted fake semi-nude photos of Victim 4, which depicted Victim 4’s face on other women’s semi-nude bodies. Victim 4 wondered “who is out to get me?”

35. In or about 2019, FLORENCE posted explicit photos of Victim 4 on an escort website, which made Victim 4 feel “sick to [her] stomach”

36. Following the execution of the search warrant, Images of Victim 4 were found on FLORENCE’s phone that had been altered to include written text over the photos with sexual overtures to the viewer like, “I have till 6. Come over and fuck me.”

37. On February 28, 2023, FLORENCE uploaded a number of images of Victim 4, on multiple occasions to the website [www.ladies.exposed.com](http://www.ladies.exposed.com) with captions that included “My

Cousin [Victim 4] Risk”, “My Cousin [Victim 4] Risked”, “My Cousin [Victim 4]”, “risk my cousin [Victim 4] fucked her”, “risk fucking my cousin [Victim 4]”, and “risk. Fucked my cousin [Victim 4]”.

38. FLORENCE created impersonation accounts using Victim 4’s name, information, and, in some instances, fake nude images on platforms like OkCupid, Twitter, Yahoo, Classmates.com, and Facebook, as recently as December of 2024. However, these accounts are still publicly viewable on the platform as recently as February 2025.

### **VICTIM 5**

39. In and around October of 2022, FLORENCE posted ads on Craigslist offering Victim 5’s underwear to share with others with a similar fetish, identifying her as a co-worker as well as by first name.

40. On February 28, 2023, FLORENCE uploaded one image of Victim 5 to [www.ladies.exposed](http://www.ladies.exposed) with the caption, “Risking [Victim 5] Upskirt. I steal her socks & panties”. Then again on March 3, 2023, FLORENCE uploaded one image of Victim 5 to [www.ladies.exposed](http://www.ladies.exposed) with the caption, “[Victim 5] Upskirt Risk”.

41. On diverse dates in 2022 and 2023, FLORENCE took voyeuristic or surreptitious photos of Victim 5 often from behind her when they spent time together. FLORENCE also had notifications set up to notify him of any biographical changes associated with Victim 5 on a data aggregating website.

42. During a forensic review of FLORENCE’s devices, agents located at least eleven homemade wallpapers on FLORENCE’s Pixel 6 Pro phone with Victim 5’s likeness and her full name, which also refer to her as an “Asian baby factory”. Also recovered from that phone by agents were several voyeuristic photos of Victim 5 from behind her in a hotel and other locations. A digitally altered image of Victim 5 to make her appear topless was also found on

FLORENCE's mobile device that appeared to be the same image as was used to make Victim 1 appear topless. Agents located a website banner, which read "PervOn [Victim 5]" and a text file with passwords for unknown accounts attributed to Victim 5 on FLORENCE's desktop.

43. Victim 5 considered FLORENCE a close friend for a large part of their almost 20-year friendship. After she became aware of fake accounts in her name and image, she felt "violated" and "disturbed". Victim 5 was nervous even going to the grocery store in case anyone she came across had thought they talked to her online. Victim 5 believed FLORENCE had taken advantage of "trusted moments" and learning he was responsible had "shaken up [her] belief system".

#### **VICTIM 6**

44. Beginning in June of 2020 and continuing to September of 2024, on numerous occasions, FLORENCE uploaded numerous nude and pornographic images and videos of Victim 6 to several websites, including, but not limited to, [www.ladies.exposed](http://www.ladies.exposed). Many of these images and videos were surreptitiously recorded from intimate relations between FLORENCE and Victim 6 without Victim 6's knowledge. FLORENCE included comments or captions such as "love this whore", "teen whore [Victim 6] exposed", "Teen Slut [Victim 6] Ass Risk", "Teen Slut [Victim 6] BJ Risk", "Teen Slut [Victim 6] Panties Risk", and numerous others when he posted these images and videos. The photos on at least one of the websites were still up as of November 2024.

45. FLORENCE created at least three accounts with the username "exposemywife[Victim 6]" or "Web Wife [Victim 6]" on platforms in which users can upload photos and videos and interact with other users, including anonymously.

46. Between 2018 and 2024, FLORENCE engaged in approximately 1100 Google searches with Victim 6's name and the terms including but not limited to "exposed", "slut", "xxx", and "webwhore".

47. In addition, between April of 2021 and March of 2022, FLORENCE posted at least twelve separate advertisements on Craigslist for Victim 6's underwear, which referenced Victim 6 and links to photos of her on the free image hosting website, imgur.com. During the execution of the search warrant at FLORENCE's residence, agents recovered underwear believed to belong to Victim 6. Images of this underwear were also located by agents during a forensic review of FLORENCE's Pixel 6 Pro phone.

48. During a forensic review of FLORENCE's devices, agents located numerous images and videos of Victim 6 performing sexual acts with filenames like "[Victim 6] Spitroast", "[Victim 6] fucked", and "[Victim 6] The Slut" on FLORENCE's desktop computer. These images and videos were consistent with the ones filmed and uploaded without Victim 6's knowledge or permission by FLORENCE. Agents also recovered digital evidence that FLORENCE was selling or attempting to sell images of Victim 6 in her underwear to others on the internet for money; again, without the knowledge or permission of Victim 6.

### **VICTIM 7**

49. In December of 2021, when Victim 7 was 17 years old, FLORENCE, who was in his thirties at that time and had known Victim 7 since she was seven years old, began contacting her over Instagram using an account with a false name. This account, which was controlled by FLORENCE, professed feelings for Victim 7 in attempt to develop an intimate relationship with her. While the statements made by this account were not explicit in nature, FLORENCE told

Victim 7 the city where she lived and indicated he was “nearby”. The statements made Victim 7 very uncomfortable, and she blocked the accounts.

50. Between May 2021 and August 2023, FLORENCE contacted Victim 7 approximately four times over Facebook Messenger using a fictitious name and profile photo. On August 31, 2023, FLORENCE, using this account, sent Victim 7 a drooling emoji and the messages “you have really cute panties and bras [Victim 7 name]” and “that purple gstring with the matching bra is my favorite”.

51. In May of 2024, FLORENCE posted a photo of Victim 7’s underwear on Instagram using an account purportedly in her name. The posting of her underwear and socks included the caption “Quite The Collection Don’t You Think” and tagged Victim 7’s true Instagram account. Victim 7 realized that the photo contained underwear and socks of hers that were missing. Victim 7 described being so disturbed by the Instagram posts of her underwear that she was scared walking home from work at night and wondered “Who’s watching me?”.

52. In total, FLORENCE created at least four Instagram accounts used to harass Victim 7, three of which used Victim 7’s name and/or usernames similar to Victim 7’s true usernames.

53. During the execution of the search warrant at FLORENCE’s residence, agents recovered underwear believed to belong to Victim 7. The underwear and socks located by agents matched the underwear and socks in images posted on Instagram by FLORENCE. Agents also identified at least one photo of Victim 7 in FLORENCE’s mobile device from when she was approximately 12 years old.

#### **CHILD PORNOGRAPHY OFFENSE**

57. FBI agents also recovered 62 images and 4 videos of child pornography in a folder labeled “FF Models Sandra” in one of FLORENCE’s external hard drives. The images

and videos depicted females between the ages of approximately six and fourteen years of age, masturbating or posed in a sexualized or obscene manner; focused on the genitals.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

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Luke A Goldworm  
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Date: April 1, 2025