

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America )

v. )

Paul Edward Lee, Jr. )

Case No. )

3:18-mj-1163-PDB )

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 April 27, 2018 in the county of Duval in the Middle District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. §§2251(d)(1)(A) and (2)(B), Solicitation and advertisement for child pornography, in violation of 18 U.S.C. §§2251(d)(1)(A) and (2)(B).

This criminal complaint is based on these facts:

See attached.

Continued on the attached sheet.

Complainant's signature

ABBIGAIL BECCACCIO, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/30/2018

Judge's signature

City and state: Jacksonville, Florida

PATRICIA D. BARKSDALE, U.S. Magistrate Judge

Printed name and title

## AFFIDAVIT

I, Abbigail Beccaccio, being duly sworn, state as follows:

### INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since May 2012. I am currently assigned to the Jacksonville, Florida Division of the FBI where I conduct a variety of investigations in the area of violent crimes. Prior to this assignment, I was employed as Forensics and Technology Unit Supervisor with the Orlando Police Department for approximately 8 years. I have a Bachelor's degree in Molecular Biology & Microbiology. I have received law enforcement training from the FBI Academy at Quantico, Virginia. A substantial portion of my duties are dedicated to investigating cases involving crimes against children under the auspices of the FBI's "Innocent Images" National Initiative. Since becoming a Special Agent, I have worked with experienced Special Agents who also investigate child exploitation offenses. In the performance of my duties, I have investigated and assisted in the investigation of matters involving the advertisement for, possession, collection, production, receipt, and/or transportation of images of child pornography and the solicitation and extortion of children to produce sexually explicit images of themselves. I have been involved in searches of residences pertaining to the advertisement for, possession, collection, production, and/or transportation of child pornography either through the execution of search warrants or through the subject providing written consent to permit a search to be conducted.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of 18 U.S.C. §§ 2251, 2252, 2252A, 2422, and 2423, as well as Florida state statutes that criminalize the sexual activity with minors and other methods of child sexual exploitation. In connection with such investigations, I have served as case agent, have been the affiant for several search warrants and conducted interviews of defendants and witnesses, and have served as an undercover agent in online child exploitation cases. I am a member of a local child pornography task force comprised of the FBI, U.S. Immigration and Customs Enforcement, the Florida Department of Law Enforcement, the Jacksonville Sheriff's Office, the St. Johns County Sheriff's Office, and the Clay County Sheriff's Office, 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 Special Agents and other 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 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 PAUL EDWARD LEE, JR. has committed a violation of Title 18, United States Code, Sections 2251(d)(1)(A), (2)(B) and 2251(e), that is, advertisement and solicitation for child pornography.

4. I make this affidavit in support of a criminal complaint against PAUL EDWARD LEE, JR., that is, on or about April 27, 2018, in the Middle District of Florida, PAUL EDWARD LEE, JR., did knowingly make, print and publish, and cause to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom defendant believed to be a minor engaging in sexually explicit conduct and which depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce, that is, by computer via the internet, in violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (2)(B), and 2251(e).

5. On April 13, 2018, FBI Supervisory Special Agent (SSA) Steven Burros contacted me and instructed me to contact a particular law enforcement officer in Illinois (the "LEO") regarding certain online contact that his own minor child ("A.L.") had engaged in with an adult male in the Jacksonville, Florida area. Later, I spoke with the LEO by telephone, and he advised that he had obtained and

secured a cellular telephone used by A.L. to communicate with an adult male. The LEO also provided me with photographs of information contained on A.L.'s phone. I have reviewed all of these photographs and information, have had several conversations about the incident with the LEO, and learned the following:

a. On April 13, 2018, the LEO's minor child, A.L. (date of birth October XX, 2003) was attending a tutoring session for specific learning disabilities and told her tutor that she (A.L.) had a special friend who was "38" years old. The tutor immediately made contact with the LEO who drove to the tutoring location. Upon arrival, A.L. told the LEO that a friend had "friend requested" her through the mobile application "ZGirls."<sup>1</sup> An individual using "ZGirls" username "(Nab)twistedmister38" contacted A.L., who accepted the friend request. After talking for "a few weeks," the user "(Nab)twistedmister38" suggested that he and A.L. move over to Snapchat to communicate and told A.L. to look for Snapchat username "beinu388" or nickname "Bubba beinu." "(Nab)twistedmister38" additionally provided a telephone number of 904-XXX-2549 to A.L. A.L. told the

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<sup>1</sup> Based on my internet research, I know that ZGirls is a free application, with a teen rating, available for both android and Apple devices. The application offers a game that centers on a school of specially trained "Zgirls," each with different zombie-killing abilities. Players collect and train "Zgirls" to protect their bases. Players can play with "friends or foes" from all over the world. The "Zgirls" app has a chat messaging function that allows users to communicate online through texting. I also know that Snapchat is a free multimedia messaging application that allows users to exchange images and messages over the internet that are available only for a short time and then become inaccessible to the ordinary user.

LEO that she communicated with whom she believed to be the same person using the user names “(Nab)twistedmister38” and “beinu388”, and also text messaging with telephone number 904-XXX-2549. A.L. stated in substance that Snapchat user “beinu388” sent explicit pictures and videos of himself and requested that A.L. send photos of in herself in “bra and panties” and “fingering” herself. A.L. additionally stated this person told her he “was falsely accused” in the past.

b. Later on April 13, 2018, I directed the LEO to send me the substantive portions of the online conversations between A.L. and the Snapchat user “beinu388,” including location data from the Snapchat user “beinu388” from A.L.’s cellular phone. I reviewed the content and instructed the LEO to send one text message from A.L.’s phone to the user at 904-XXX-2549 with the following message, “cant talk dad grounded me for bad grades. He’s in shower. Will text you when I get phone bk.” I then instructed the LEO to place A.L.’s phone in “airplane mode” and send the cellular telephone to the Jacksonville FBI office for further investigation.

c. The LEO sent me three photos of Snapchat user “beinu388”’s geolocation data taken from A.L.’s cellular phone. The top portion of one image stated “Bubba Beinu” “beinu388” and “1h ago in Jacksonville, Florida.” This

image additionally depicts a Bitmoji<sup>2</sup> and a yellow heart<sup>3</sup> next to and under, respectively, the Snapchat display name “Bubba Beinu.” This Bitmoji is a cartoon-like depiction of a person. This Bitmoji depicted appeared as a white male with close cut brown hair and blue eyes. The other two images provided depict this same Bitmoji standing on a map. The map depicts what appears to be a satellite view and the Bitmoji character is depicted standing on a structure just east of Old Kings Road, northeast of the structure is a pond. The last map depicts a standard map view and the Bitmoji is standing in the same approximate location, east of Old Kings Road and North of Division Street, and parallel to Iowa Avenue on the West. A train crossing is depicted further south on Old Kings Road. Based on review of a map of Jacksonville, Florida, this map depicted an area located in Jacksonville.

6. On April 23, 2018, I received A.L.’s cellular phone. I reviewed its relevant contents and learned the following:

a. On March 18, 2018, at 05:15 hours, on the “Zgirls” application messaging function, the user “(Nab)twistedmister38” sent the following message, “hi

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<sup>2</sup> According to Snapchat information available online, a Bitmoji is “your own personal emoji” or a cartoon avatar depicting the online persona of the user in the shape of a person. A user may select and customize his/her own Bitmoji.

<sup>3</sup> According to Snapchat information available online, a yellow heart denotes that two users are “#1 best friends,” and denote the person that “you send the most snaps to this person, and they send the most snaps to you.”

friend and I hope u can consider me that is it ok". On April 7, 2018, at 22:15 hours A.L. responded, "Yes".

b. On April 10, 2018, at 08:09 hours, "(Nab)twistedmister38" stated, "how old and do u mind me if I'm older" "?". At 08:12 hours, A.L. stated, "But I think I'm a lot younger and you want like that". Again at 08:12 hours, "(Nab)twistedmister38" stated, "I do" and "and would ok." At 08:13 hours, A.L. stated, "Ok I'm 15", "(Nab)twistedmister38" then stated, "I still here not running" "kissing ur lips" and "ok hunny." At 08:16 hours, A.L. stated, "Ok" and "Who old are you". At 08:21 hours, "(Nab)twistedmister38" stated, "u don't mind 38 do u".

c. On April 10, 2018, at 08:35 hours, "(Nab)twistedmister38" stated, "I live in Florida by the way and do u know" and "I'm a faithful loyal person".

d. On April 11, 2018, at 13:59 hours, "(Nab)twistedmister38" stated, " want my number" "?" and "by way of cell ok". At 14:00 hours, "(Nab)twistedmister38" stated, "mind u I got a sexy pare of blues" and "1 904 XXX 2549".

e. On April 11, 2018, at 17:38 hours, "(Nab)twistedmister38" stated, "to put a what honey you should know honey I got no problems okay with you or anyone I love you very very much to help you okay I'm walking home very

busy highway trying to get to my house love you and my number is 904-XXX-2549 country code USA 01”.

f. Later on April 11, 2018, between 21:45 to 21:47 hours, “(Nab)twistedmister38” referred to his “shaft” being “huge” “for a white man ok love”.

g. Also on April 11, 2018, between 22:23 to 23:13 hours, “(Nab)twistedmister38” discussed, among other things, his Snapchat user names “beinu388” and “Bubba beinu” and making up a name for his contact in A.L.’s phone.

h. On April 12, 2018, on the Snapchat application, messaging function, the user “Bubba Beinu” sent the following message to A.L.’s Snapchat account, “Or want to still, Well?” A.L. responded, “Ok and I’m fat so no bra or pantos shots”. No images were recovered on the Snapchat application between these users.

7. On April 23, 2018 at my direction, FBI SOS M. Hammerling began attempting to identify the identity of the person using the accounts and/or numbers: “(Nab)twistedmister38”, “Bubba Beinu”, “beinu388”, and 904-XXX-2549. SOS Hammerling has advised me of and provided me with the following information, some of which was set forth in written documentation that I have reviewed and learned the following:

- a. Open source queries of telephone number 904-XXX-2549 revealed three linked social media accounts (WhatsApp, Google and Telegram) associated with “Paul Lee.”
- b. A query of the Florida Drivers and Vehicle Information Database (DAVID) for persons holding a State of Florida Driver’s License or Identification Card residing in Jacksonville Florida with the name “Paul Lee.” This query revealed eleven possible individuals, including Paul Edward Lee, Jr., date of birth [REDACTED] (38 years old), with an address of 8945 Old Kings Road, Jacksonville, Florida 32219. The DAVID photo depicts a white male with blue eyes. Additional birth certificate records obtained from DAVID indicate that Lee’s mother’s maiden name is La Force.
- c. Additional law enforcement records stated that Lee is a registered sexual predator in the State of Florida who was previously convicted of lewd and lascivious behaviors on a ten year old child and was released from prison in 2017.
- d. According to Law Enforcement reports obtained from the Jacksonville Sheriff’s Office (JSO), Lee additionally manufactured child pornography with the same ten-year-old victim. Additionally, in these reports Lee claimed to have been setup by someone named “Devil Wolf”.
- e. A query of the Florida Department of Law Enforcement (FDLE) Sexual Offenders and Predators Search for the address located at 8945 Old Kings

Road, Jacksonville, Florida, revealed Lee is registered as a “Sexual Predator” and has a Florida Department of Corrections (DOC) number of J44963. According to FDLE records, seven additional registered sexual predators and one registered sexual offender also reside at this address.

8. On April 23, 2018, SOS Hammerling prepared an administrative subpoena directed to Snapchat, Inc. requesting the subscriber and Internet Protocol (IP) information for the account Display name “Bubba Beinu” and username “beinu388”.

9. On April 25, 2018, a Snapchat, Inc. custodian of records, responded to this administrative subpoena and provided the following information that I have reviewed. No subscriber or IP information was available; however, the account was created April 12, 2018, at approximately 02:39:54 UTC.

10. On April 23, 2018, I took A.L.’s cellular phone off airplane mode and received the following text message from contact “Boy” at telephone number 904-XXX-2549, “A. u avoiding me for too long I’m done waiting u say you lobe and care for me now ill ask u prove it im.done u want or love me probe it im.done later”.

11. On April 25, 2018, I began communicating with Lee as an FBI Online Covert Employee (OCE) capacity as A.L. At 7:50 a.m., from A.L.’s phone I sent the following message, “Got phone bk!!!! Y are u mad???” Lee responded also at 7:50 a.m. and 7:51 a.m. respectively, “He’ll guck no” and “I missed u like crazy”. At

7:57 a.m. and 7:58 a.m. Lee stated, "Mrs Lee" "And I u" and "I love u so much" "I told u I'm marrying u". Between 8:05 a.m. and 9:30 a.m. Lee and I engaged in the following conversation: Lee: "Can you take some pics of of you for me I'm I'm really want to see you again and to let you know I'm trying to like download stuff that I had before". OCE: "Ur so sweet to me. Love u what pics??" Lee responded, " I want is u....I love u....forever....any and all....In pics....Besides I can't stop thinking of u in the tub remember....I just want to fuck u and fill u with cum and make u forever happy....Also Mary u....Have u as my wife....Forever". OCE: "Love u. I try just don't know what u want". Lee: "I won't say no to nudes of u....And this is for you". Lee then sent a photograph of an erect male penis and shortly after stated, "I'm dreaming of filling u with the hole shaft deep inside I and I having our children....And we grow older together....Yes I know how young still don't care". Communications between Lee and me as OCE continued until approximately 2:49 p.m.

12. On April 26, 2018, I continued to act in an OCE capacity as A.L. Communication began at approximately 7:46 a.m. and included the following. OCE: "Got my phone bak for school again!!!!!! Hi!!" At approximately 7:54 a.m., Lee typed, "U are how ever are gona get a spanking when we meet one day lol it will be my dick spanking your pussy lol". OCE: "Will it hurt??" Lee: "No it won't it will hurt like with all virgins but it will only hurt for a few pain will stop and u will feel a

strange sensation that will grow excite and pleasure also arouse u to the point if a climax once that happens every thing will go blank in your eyes but only be blissfully happy....And yes there will be a trickle of blood your hymen will break and then no more virgin but a woman and if not done properly a child will come of it". Lee went on to state, "Hence why the pill as in birth control and a after pill to prevent kids one and so u know that I love u I'll buy also latex free condoms with spermicide". Lee continued and talked about the "Karma sutra," teaching A.L. how to obtain her GED, beat the lottery odds, and how to "make you self invisible". Lee later asked, "Hunny how old now?...Ur 15 right....Or 16....Turning 17....Like I think u told be before correct". OCE told Lee that he may be mad at her because, "Ok. I'm gonna be 15 in October". Lee stated, among other things, "Ok hunny....U could deliver news papers that's age 14 on up....Did u know that?" Lee then went on to explain jobs that A.L. could work given her age and if he can send a voice clip. At approximately 9:15, Lee sent an audio clip that stated, among other things, he loved A.L. and does not judge by any other means. Lee is then heard making a kissing sound and hugging noises. Lee then asked A.L. to call her, further stating it is, "this is my own cell number ok." Lee additionally requested A.L. find him on Snapchat at approximately 9:15 a.m. and 9:35 a.m. and stated, "Look for Paul laforce" and "And look for Paul Laforce....Thats my new snap account". Later at 10:11 a.m., following some conversation, Lee sent a photo of himself "kissing" the camera with

his eyes closed. It is a photo of Lee's face, which I recognize from his DAVID photo discussed above, and appeared to have been taken by Lee himself, that is, a "selfie." Lee was depicted wearing a white colored tank top shirt. At 10:12 a.m., Lee sent a video that depicted the masturbation of an erect Caucasian penis. Among other things, Lee stated that he loved A.L. and do you feel "daddy". Lee later stated, "And please after u see every thing delete them....So that your dad don't go ape shit ok". At 11:43 a.m., Lee sent another photograph of a Caucasian penis, which has had the following text added, "Y MADE MY SELF CUMM FOR U I DID CLOSE UP O". Lee then sent two additional audio clips and explained why his previous texts were slightly confusing. Lee explained that he is transporting water back to his residence in a wheelchair and was walking on a busy highway. Following this, Lee sent a photograph of the wheelchair with large water bottle in it. Later between 1:43 and 1:49 p.m., Lee stated, "We met on zgirls....I'm twistedmister38....You said do u really know me....I'm paul....Real life Mrs lee....I gave u my last name". Lee went on to explain the marriage laws in numerous states in the Unites States, explaining that marriage laws can be different in each state. At 2:19 p.m., Lee sent another "selfie" with his eyes open and a partial smile. It was a photo of Lee's face, which I recognize from his DAVID photo discussed above. Lee was depicted wearing a white colored tank top shirt and has blue eyes. Lee then further stated, "See ya I gotta big Frenchman nose....Laforce is my grandfather's last name...." At 2:41

p.m., OCE asked, "What pics did I send u?" Lee later stated, "It was u in your panties u in the tub nude and u topless showing me your breast that I love u had posted pics of u talking with a friwnd".

13. On April 27, 2018, I continued to act in an OCE capacity as A.L. After taking the phone off airplane mode at approximately 3:00 p.m., I received approximately seventeen messages from Lee. Later, at 3:59 p.m., Lee sent a video depicting the masturbation of an erect Caucasian penis, which from the video and sound appears likely to be his own penis. During the video, Lee can be heard professing his love for A.L. Portions of the following text conversation then occur between 4:00 p.m. and 4:13 p.m.:

LEE: Wish I was in u

OCE: On  
In me?

LEE: Ya if u show me ok  
Yeah want me too

OCE: Show u what

LEE: Show ur pussy to me  
If u wish tpo  
And picture me inside u in your mind do u like that  
thought

OCE: You mean like show u a pic of my vagina?

LEE: If u want too?

OCE: Is that bad if I do???

From approximately 4:13 p.m. to 4:22 p.m., Lee attempted to explain what he wanted from A.L. Portions of the following conversation then occurred between approximately 4:23 p.m. and 4:37 p.m.:

OCE: I still don't understand what pic u want maybe I don't get  
it

LEE: I want of u nude showing ur virginia  
And u know that your virginia is mine and my dick is your

OCE: Ok bby

LEE: Ok can u show me my love  
I want to see u so much and fill u with my cock

OCE: Ok I try!!

LEE: And just pump slowly inside u n and out slowly and easy  
for u

To enjoy and feal the sedation of my dick

Hunny

OCE: It's bad but it sounds good lol

But what's virginia

LEE: Typo

Portions of the following conversation then occurred between approximately 5:31 p.m. and 5:38 p.m. OCE: "So a pic with my finger?" Lee stated, "No just your clit only". Lee then sent another masturbation video of an erect Caucasian penis. OCE then explained that she does not know what a "clit" is and Lee further explained, "Virginia clit and pussy is between your legs it's all the same name". Lee then continued to explain how to masturbate using the "cliteris" and "g spot". Following this, Lee inquired at 5:44 p.m. to 5:50 p.m.:

LEE: Can I see

You do so

OCE: See what

LEE: You do so

As in trying it

OCE: Like a vid??

LEE: Ya will u?

OCE: So a vid with my fingers

LEE: If you want too?

Will u

Show me?

Please baby?

OCE: So what in the vid?

LEE: U touching ur clit as in masturbating rubbing and so on u  
can call me by name i love u

14. At my request, on April 26, 2018, a Child and Adolescent Forensic Interview (CAFI) was conducted by CAFI Interviewer Rachel Happel and observed by FBI SA Richard Box of the minor A.L. I briefed both CAFI Happel and SA Box prior to the interview and then spoke with them following the interview. SA Box also provided be with his report, which I have reviewed and learned the following:

a. A.L. began texting with twistedmister38 (hereafter subject) over the Zgirls application. Subject sent her a friend request through the app and she began texting him a few weeks later.

b. Initially, A.L. lied about her age telling him she was 15 years old. The subject told A.L. that he was 38 years old. A.L. additionally stated, "He called me and tried to facetime me, but I didn't answer."

c. A.L. stated that the subject had sent pictures and videos of himself on Snapchat, "his parts in Snapchat", "dick pics and videos" and "himself jerking off". In addition, the subject asked A.L. to send "bra and panty pics" and "of me fingering myself".

d. The subject also told A.L. "he was falsely accused and spent some time in jail".

e. A.L. was shown three pictures of images captured from her cellular telephone and identified “(Nab)twistedmister38” as being the user name utilized by the subject on the ZGirls app; “Bubba Beinu as the user name utilized by the subject on Snapchat; and that she had saved the subject in her cellular telephone under the name “boy”.

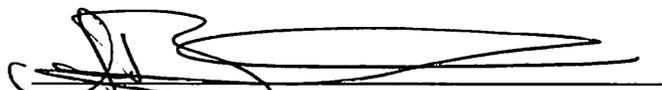
15. At my request, on April 25, 2018, FBI SA Kurt Limpert and Field Photographer (FP) Jon Fletcher conducted surveillance in the vicinity of Paul Lee’s listed DAVID residence, that is, the residence located at 8945 Old Kings Road, Jacksonville, Florida. FP Jon Fletcher then provided me with email communication of the photographs which I have reviewed. I have additionally conducted visual surveillance in the vicinity of Paul Lee’s listed DAVID residence, that is, the residence located at 8945 Old Kings Road, Jacksonville, Florida, on several dates including April 24, 25, 27 and 29, 2018.

16. On April 30, 2018, I reviewed a copy of a judgment and conviction in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, Case No. 16-2006-CF-009573-AXXX-MA, showing that on June 22, 2011, Paul Lee was convicted of one count of lewd or lascivious molestation in violation of Section 800.04(5)(b), Florida Statutes, and one count of lewd or lascivious molestation in violation of Section 800.04(7)(c), Florida Statutes. I have also reviewed a Jacksonville Sheriff’s Office police report dated June 15, 2006 from the investigation

of this case. It provides, in pertinent part and among other things, that Lee admitted taking pictures of a 10 year old minor female naked and further that he let the child hold his penis. Accordingly, after consultation with Assistant United States Attorney D. Rodney Brown, I believe that Paul Edward Lee, Jr. has at least one prior conviction under the laws of the State of Florida relating to sexual abuse involving a minor as described in 18 U.S.C. § 2251(e).

17. Based upon the foregoing facts, I have probable cause to believe that on or about April 27, 2018, in the Middle District of Florida, PAUL EDWARD LEE, JR., did knowingly make, print and publish, and cause to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom defendant believed to be a minor engaging in sexually explicit conduct and which depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce,

that is, by computer via the internet, in violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (2)(B), and 2251(e).

  
ABBIGAIL BECCACCIO, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this  
30th day of April, 2018, at Jacksonville, Florida.

  
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PATRICIA D. BARKSDALE  
United States Magistrate Judge