

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

THOMAS ROWLAND

Case No.

6:19-mj- 1436

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 March 24, 2019 - June 22, 2019 in the county of Brevard in the Middle District of Florida and elsewhere, the defendant(s) violated:

Code Section

18 U.S.C. § 2422(b)

Offense Description

Attempted enticement of a minor.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Jody L. Harrison, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/22/2019



Judge's signature

City and state: Orlando, Florida

DANIEL C. IRICK, U.S. Magistrate Judge

Printed name and title

STATE OF FLORIDA

CASE NO. 6:19-mj- 1436

COUNTY OF ORANGE

**AFFIDAVIT**

I, Jody L. Harrison, being duly sworn, hereby state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), and have been employed by HSI as such since February, 2012. I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510 (7), and I am empowered by law to conduct investigations and make arrests for felony offenses. I have been a federal law enforcement officer for over 12 years in total with HSI and the United States Border Patrol.

2. I have received extensive training and practical experience pertaining to federal criminal procedures, federal criminal statutes, United States Customs Laws and Regulations, and other federal and state laws pertaining, but not limited, to investigations of sex crimes, child exploitation, child pornography and computer crimes. I have been involved in investigations involving child pornography and online solicitation/enticement of a minor. I have participated in investigations of persons suspected of violating federal child pornography laws, including 18 U.S.C. §§ 2252 and

2252A. I have also participated in investigations of persons suspected of violating federal laws pertaining to the enticement of minors in violation of 18 U.S.C. § 2422 (b). I have participated in various training courses for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography. Additionally, I have been involved in authoring and participated in the execution of search warrants involving searches and seizures of computers, computer equipment, software and electronically stored information.

3. I reasonably rely on the information identified in this affidavit. This information is of the quality and quantity routinely and properly relied upon by law enforcement personnel in conducting investigations and analyzing the existence of probable cause to believe crimes, such as those being investigated in this matter, are being or have been committed. Since this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant for Thomas ROWLAND (ROWLAND), I have not included each and every fact known to me concerning this investigation. I have set forth only those facts I believe are necessary to establish probable cause in support of a criminal complaint

naming ROWLAND for violations of 18 U.S.C. § 2422(b), attempted enticement of a minor.

#### **RELEVANT STATUTE**

4. Title 18, United States Code, Section 2422(b) prohibits a person from using a means and facility of interstate or foreign commerce to knowingly attempt to persuade, induce, or entice an individual who has not attained the age of 18 years to engage in prostitution or any sexual activity for which any person could be charged with a criminal offense. It is a crime under Florida Law to commit Lewd or Lascivious Battery, Fla. Sta. § 800.04(4). The attempted commission of this offense is also a violation of 18 U.S.C. § 2422(b).

#### **DETAILS OF INVESTIGATION**

5. On March 24, 2019, a Task Force Agent (TFA) with HSI acting in an undercover (UC) capacity, from Brevard County, Florida, conducted an undercover investigation in an online website. This website is for persons who have a sexual interest in children. While in this website, the UC was engaged in communications with a person who has been identified as Thomas ROWLAND. The UC informed ROWLAND that he was the father of a 13-year-old female child. ROWLAND used the screen name "KINKYDADDY68," "KINKYDADDY," and "TOM" during the

conversation with the UC. ROWLAND asked the UC, "still looking for someone to put on a show with ur dau?" and "id love to help out!" The UC informed ROWLAND that the daughter was a minor child. ROWLAND asked if the child had experience in having sex with adults. The UC informed ROWLAND that the child did have that experience and ROWLAND replied to the UC, "perfect."

6. The UC informed ROWLAND that the UC lived in Florida. ROWLAND replied, "damn - was literally there on vacation last week." ROWLAND stated, "it might be a little while but i could probably fly down for a weekend some time." The UC asked ROWLAND if he had sexual experience with minor children. ROWLAND replied, "a little - a gf's 14yo dau." ROWLAND asked the UC if the child liked putting on shows for daddy and said, "always more fun when they're enthusiastic."

7. On March 31, 2019, ROWLAND sent the UC the following bulleted list by email:

"OK... Here goes:

- How do we each assure ourselves that the other is not associated with law enforcement and that this isnt some elaborate honey trap?
- How much lead time do you need to arrange for a play date?
- Is the play date at your place? My hotel? A neutral site?
- How long does her typical play date last? An hour? An afternoon/evening?

- What sort of limits do you have?
  - Condom use
  - Oral/vaginal/anal availability
  - Other?
- What sort of play day is she expecting?
  - sexy/loving
  - mild bondage (blindfolds, cuffs)
  - "slut training"
- I'm in my early 50's. Is she going to freak out about a "dirty old man"?
- You mentioned previously that you're a voyeur...
  - I assume this means you will be physically present during the play date (no problem either way)
  - Watching and not touching?
  - Do you plan to record the play date?

KinkyDaddy."

8. The UC told ROWLAND that the UC was not a cop and reminded ROWLAND once again that the child was a minor. The UC told ROWLAND that if ROWLAND was not good with any of this that it was ok. ROWLAND stated that he had rules if his sexual encounter with the minor child was going to be recorded: "1. No face (obviously). I would prefer to wear a mask to be safe. 2. For private use only. I don't want to see it on CP (child pornography) forums. 3. I get a copy for private use." ROWLAND also stated that he was not looking for male to male contact, "but I see no reason we couldn't spit-roast or DP (double penetrate) her if she's willing to take on two dirty old men."

9. On this same date, ROWLAND informed the UC that he wanted to book a flight to Florida and wanted to stay at the UC's house. ROWLAND stated, "I'd love to stay with you, especially if you're planning to check her out of school while I'm there. I'll definitely plan to check a bag full of fun..." ROWLAND asked, "how does something connected to the weekend of June 22 sound?" and "my [birthday] is that weekend so I can take either Friday or Monday." ROWLAND asked the UC for the minor child's body measurements so that he could buy "sexy outfits" for the child to wear during his sexual encounters with the child.

10. On April 2, 2019, ROWLAND stated, "I've been walking around with a permanent hardon thinking about this - I can't wait!" ROWLAND made the following comments regarding items he wanted the UC to have available during his sexual encounters with the minor child: "a couple of small jars of vaseline - i like to use that to prep an asshole before fucking it - its easier to get inside and make sure its well prepped...and a couple of small ones so we can keep them handy in several rooms - nothin kills the mood like having to hunt down the lube." And, "a a good-sized bottle of baby oil - it should be fun to oil her up some time" and "some good, soft cotton rope." Also, "lots of conventional lube - again convenience convenience convenience," "towels"

and “in fact baby wipes might not be a bad idea.” ROWLAND said he would also bring some lubricant when he packed.

11. On April 3, 2019, ROWLAND asked the UC if the UC owned a weight bench. ROWLAND stated that he wanted to tie the minor child to the weight bench. ROWLAND told the UC that he found some cute outfits for the minor child, and listed the outfits, “schoolgirl, cheerleader, bride/virgin, fuck-bunny.” ROWLAND also informed the UC that he bought the child assorted sexy panties. ROWLAND stated that it was hard to find sexy clothes in “jailbait” size.

12. ROWLAND told the UC to ask the child if she was ok being tied up. ROWLAND sent the UC an internet link of images and videos of females engaged in different sexual acts involving bondage. ROWLAND told the UC to show the child the internet site. The UC again reminded ROWLAND of the child’s age, namely, 13 years old.

13. ROWLAND informed the UC that he had booked his flight from Philadelphia to Orlando, and gave the following flight information: “Just booked my flights: Friday June 21 Arriving ORLANDO @10:10 PM American Flight 1919 Saturday June 29 Departing ORLANDO @ 2:30 PM American Flight 688 Looking forward to a fun and exciting week with you and [child’s name]! TOM.” Agents verified that ROWLAND had booked



passage on these flights. At the time of verification ROWLAND was the only person that was booked for both flights.

14. On April 5, 2019, ROWLAND sent the UC an email showing photos of the outfits he purchased for the child to wear during their sexual encounters, "Hey [UC's name] - Though you might enjoy a sneak peek at some of the coming attractions: [drop box web address] #150243 thru #150304 - Outfit #1 (Fuck Bunny), #150645 thru #150717 - Toys [child's name] should enjoy, #151011 thru #151029 - Restraints (if [child's name] wants to be tied up), #151412 thru #151434 - Blindfolds, gags, collars (again, if [child's name] wants to be tied up), Can't wait for June! TOM."

15. On April 6, 2019, ROWLAND sent the UC a zip file labelled "[child's name].zip." This file contained photographs of bunny ears, bunny nose, nipple clamps, and an anal plug with pink fur ball attached to it. Also photographs of a glass dildo, silver in color anal plug with a clear stone on the front of it, two black Ben Wa balls and a silver in color vibrator, a pair of handcuffs, two other pairs of restraining devices, ball gags, blindfolds, a black collar with the word "slut" attached to it, a pink collar with the word slut attached to it and a dog leash.

16. Approximately five hours after ROWLAND sent the UC the zip file, he sent the UC a collection of photos. ROWLAND stated, "It must be

photo day. Look at what just showed up at my door this afternoon: #144237 thru #144323 - The Virgin Bride, #145104 thru #145121 - A nice ensemble in black, #145637 thru #145655 - various pretty panties, some of which will probably end up with the (still forthcoming) Schoolgirl and Cheerleader outfits. Can't wait for June! TOM."

17. Throughout the months of April and May, ROWLAND kept in touch with the UC and maintained his desire to fly to Florida to have sex with the notional child. ROWLAND also stated that he was bringing a Hitachi wand vibrator and that he would love to give the child a "mind-melting orgasm with it."

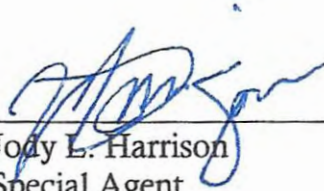
18. On June 18, 2019, ROWLAND sent the UC an email stating that American Airlines informed him that his flight was changed from Flight #AA1919 to flight #AA1673 departing on June 21, 2019, from Philadelphia at 9:14 p.m. and arriving in Orlando at 11:52 p.m. ROWLAND stated, "Hope this isn't going to be a problem. Still a go from my end as long as it isn't a problem at yours."

19. On June 21, 2019, at approximately 11:30 pm, a surveillance team observed ROWLAND exiting the passenger-way at gate 22 from flight AA1673 at the Orlando International Airport. ROWLAND was carrying a black in color duffel bag. Rowland was under constant surveillance from the

gate to the baggage claim area where he retrieved a green in color suitcase from the baggage carousel. ROWLAND then made contact with the UC curbside at the Arrival pickup area of the airport. ROWLAND introduced himself as "Tom" to the UC. ROWLAND and the UC travelled to Brevard County, where ROWLAND believed he would be meeting the UC's minor daughter for sex. ROWLAND made several statements corroborating the intent he discussed with the UC during the chat conversations. Over a UC telephone, ROWLAND spoke to an undercover law enforcement agent, who he believed to be the notional minor child. During this conversation, ROWLAND again made statements which corroborated his intent to meet the minor child. The interactions between ROWLAND and the UC were audio and video recorded. ROWLAND was then taken into custody.

**CONCLUSION**

20. Based on the aforementioned facts, there is probable cause that in Brevard County, within the Middle District of Florida, and elsewhere, Thomas ROWLAND did violate 18 U.S.C. § 2422(b).

  
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Jody L. Harrison  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me  
this 22 day of June, 2019.

  
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DANIEL C. IRICK  
United States Magistrate Judge