

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America )

v. )

ANTONY EUGENE WOODY )

Case No. )

3:19-mj-1317-JBT )

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 Dec. 8, 2018-Jan. 23, 2019 in the county of Clay in the Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 2251(d)(1)(A), (2)(B), and 2251(e)

Solicitation and advertisement for child pornography

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

Complainant's signature

Jonathan S. McDonald, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/27/2019

Judge's signature

City and state: Jacksonville, Florida

United States Magistrate Judge Joel B. Toomey

Printed name and title

**AFFIDAVIT**

I, Jonathan S. MacDonald, 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 November 2008. I am currently assigned to the Jacksonville, Florida Division of the FBI where I conduct a variety of investigations involving violent crimes and crimes against children. I have a Bachelor of Science in geology and a Master of Science in geology. 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 and solicitation 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 have 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 exploitation task force comprised of the FBI, the Florida Department of Law Enforcement, and the State Attorney's Office, among other agencies. These agencies, and others, 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. Based on my training and experience, I know that the internet is a means and facility of interstate commerce.

3. The statements contained in this affidavit are based on my personal knowledge, as well as on information provided to me by other Special Agents, FBI employees, and other law enforcement officers and personnel, among others, including Detective Ryan Ellis of the Clay County Sheriff's Office (CCSO) and

analysts at the National Center for Missing and Exploited Children (NCMEC). 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 ANTONY EUGENE WOODY 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 ANTONY EUGENE WOODY, that is, during the period from on or about December 8, 2018 through on or about January 23, 2019, in the Middle District of Florida, ANTONY EUGENE WOODY did knowingly make, print and publish, and cause to be made, printed, and published, notices and advertisements seeking and offering to exchange, display, distribute, and reproduce visual depictions, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions are 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 February 25, 2019, the FBI Jacksonville Field Office was notified by electronic communication of an investigation conducted by the FBI Boston Field Office. I reviewed this communication and learned that FBI Boston received information from the Westbrook (Maine) Police Department (WPD), and that WPD officers had executed a search warrant that led to the identification of an individual named Tyler Garnett involving dissemination of sexually explicit materials and possession of sexually explicit materials of a minor under the age of 12. I learned that Garnett was interviewed as part of that search warrant execution. I also learned that during that interview, Garnett admitted, among other things, his involvement in child pornography using a particular social media platform that he used to distribute child pornography to others using the internet.

6. I also learned from the same FBI electronic communication that on January 3, 2019, FBI agents in Boston arrested Garnett on a probable cause complaint for possession and dissemination of child pornography. After Garnett's arrest, Boston FBI agents and personnel conducted a review of the particular social media platform used by Garnett and determined that there were numerous other recipients of child pornography. One such individual identified during this investigation was an individual whose user name was "imsooofreakyy".

7. I have also reviewed some of the communications and images exchanged online over the internet using the particular social media application between Garnett and the user “imsooofreakyy”, including the following:

On July 18, 2018 at 22:49:17 EDT, Garnett sent a picture of a prepubescent female toddler being penetrated by an adult male penis to the user “imsooofreakyy”. I have reviewed this image, and based on my training and experience, and the relative size of the child as compared to the adult penis, this image depicts a toddler being raped. Based on my review of this image, I have probable cause to believe that it depicted a minor engaged in sexually explicit conduct as defined in 18 U.S.C. § 2256. In response, the user “imsooofreakyy” sent Garnett a few images and asked Garnett to pay money to user “imsooofreakyy” for additional files of videos and/or pictures. On July 19, 2018 at 15:36:12 EDT, Garnett typed “How much for hard?”. The user “imsooofreakyy” responded, “\$80 for 40 \$50 for 20 vids”.

8. On January 8, 2019, FBI Boston agents caused an administrative subpoena (#496749) to be served to the particular social media platform provider for the subscriber information for the user “imsooofreakyy”.

9. Using the information about the IP address used by the user “imsooofreakyy” and provided pursuant to subpoena #496749, on February 13, 2019, FBI Boston agents caused an administrative subpoena to be served on

Comcast for subscriber information associated with the IP address used by “imsooofreakyy”. Responsive documents revealed that the subscriber of the IP address was a particular individual with internet service enabled and supplied to a residence located at 2649 Big Sur Avenue, Orange Park, Florida 32065.

10. On March 2, 2019, I met with CCSO Detective Ellis, whom I know to be cross-sworn as a federal Task Force Officer (TFO) with U.S. Homeland Security Investigations (HSI). During this meeting, Detective Ellis and I reviewed and shared the results of the FBI’s findings in this investigation in Boston, as set forth in part above. Detective Ellis advised me that the CCSO had received several CyberTip<sup>1</sup> leads/complaints regarding the same user named “imsooofreakyy” on the same particular social media platform, as well as other variations of that user name including the user name “freakynasty951.” Detective Ellis advised me that one such CyberTip complaint included an associated subscriber email address of [tony.woody32087@gmail.com](mailto:tony.woody32087@gmail.com).

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<sup>1</sup> Based on my training and experience, I know that “CyberTips” are referrals that are provided to the National Center for Missing and Exploited Children (NCMEC) when a person or corporate entity detects evidence of child exploitation online. When received, NCMEC provides these CyberTips, along with the reported information, to law enforcement agencies located within the same geographical area and/or jurisdiction from which the conduct reported therein arises. I have reviewed some of the CyberTips in this investigation that resolved to email addresses and accounts associated with Antony Eugene Woody.

11. On March 15, 2019, I met with Detective Ellis to review updated investigative findings by the CCSO and the FBI regarding the user “imsooofreaky.” I learned that on February 2, 2019, CCSO received a call for law enforcement service from the residence on Big Sur Avenue in Orange Park referenced above. This call for service was initiated by a complainant named Antony Woody, who provided a contact telephone number of (904) 514-5197 and complained in substance about a belligerent roommate at his residence located at 2649 Big Sur Avenue in Orange Park, Florida.

12. On March 22, 2019, CCSO executed a state search warrant at the residence located at 2649 Big Sur Avenue, Orange Park, Florida 32065, and I was present for this execution. At the time the search warrant was executed, Antony Eugene Woody was not present at this residence. However, I learned information provided by other occupants of the residence that Antony Woody had previously lived at the residence and had very recently relocated. Additionally, I learned from information provided by the other occupants that Woody currently worked at a local supermarket located on Blanding Boulevard in Orange Park. Later on the same morning, Detective Ellis and I then traveled to this supermarket in an effort to meet and speak with Woody.

13. A short time later on March 22, 2019, Detective Ellis and I arrived at the supermarket located on Blanding Boulevard in Orange Park and made contact

with Antony Eugene Woody in person. Our encounter with and interview of Woody that occurred was audio recorded, and I have reviewed this audio recording. Detective Ellis confirmed Woody's name and his date of birth. Thereafter, Detective Ellis introduced himself and we showed Woody our official law enforcement credentials. Detective Ellis confirmed that Woody's phone number was 904-514-5197. Detective Ellis advised Woody of his constitutional rights. After this advice of rights, Detective Ellis asked if Woody had "any issues speaking with [them]," and Woody responded, "No." During this interview, Woody provided, among other things, the following information<sup>2</sup>:

a. Woody advised in substance that no one else had access to his cell phone, that it was a Samsung Metro PCS, and he had that phone number (904-514-5197) for about two months "or so." His previous cell phone number was 904-258-4733, and that he had the number for about a year or so. He has had that cell phone for about three weeks, and he bought it new. Woody confirmed that his address was 2649 Big Sur Avenue in Orange Park, and that he had lived there for "just under a year," or about eight months or so. He lived there with several other individuals that he named. He has two jobs, working at the supermarket and another retail store. When asked about things that go on at his residence, he

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<sup>2</sup> The information set forth below is intended to be neither a full transcript nor an all-inclusive summary of the interview with Woody.

denied having internet at the residence. He has Facebook and “that’s it.” His cell phone receives text messages. Woody has lived in Clay County for about eight months. He met the person whom he lived with at the Big Sur residence through Facebook when he was looking for a place to rent. His emails are [antonywoody@yahoo.com](mailto:antonywoody@yahoo.com) and [bornblessed87@yahoo.com](mailto:bornblessed87@yahoo.com). Woody drew a diagram of where his room was located in the residence, which was the room located in the right rear of the residence.

b. Woody was asked when he last logged into the “freakynasty951” account on the particular online communication application (referred to herein as “the App” or “App”), and he estimated that it had been about six months. He said that he was not too internet savvy. Woody stated that he did not think that anyone else used his App account. Woody asked what program he used to make superimposed watermarks with words on his pictures on the App. He explained that he used characters at the bottom of the screen and drew a diagram to show how that was done. He stated that he had last accessed his T\_\_\_\_\_ (which I know to be an online website used for sharing images and videos, among other things) account about six months ago, but he no longer has that app. When asked about the [tony.woody3208](mailto:tony.woody3208), [woods.tony86](mailto:woods.tony86), [instalover4300](mailto:instalover4300), and [tonywood701@gmail.com](mailto:tonywood701@gmail.com) emails, he claimed not to remember some of them. He was told that subpoena requests came back to the Big Sur residence, and that his accounts were logged into

from there. When asked why he used “young vids” on his App account and if he was making money, he admitted that he made “a little bit of money,” that is, “like \$100,” and laughed. When asked why he wrote “Wanna buy some young vids [App]freaknasty951,” Woody acknowledged that he put the labels on the images. He stated that when he lived at a residence in Jacksonville about a year ago, someone tried to sell images to him on the internet. He was shown an image with a label that read, “Hot vids for sale [App]freaknasty,” and he was asked how old that “kid” depicted was. Woody agreed that the minor was underage (under the age of 18) and said he did not know who sent these materials to him. Woody agreed that some of these materials depicted children engaged in sex acts. Woody was shown a particular image that depicted a prepubescent boy with a man’s penis in the boy’s mouth. The text superimposed on this image read, “[App]freaknasty951 father \$on time!”<sup>3</sup>. Woody agreed the image depicted a child 5 to 8 years old. I have probable cause to believe that this image depicts a prepubescent minor based on his child-like facial features (side view) and the child-like size of his body in comparison to the adult male also depicted. Based on my review of the CyberTip information as set forth above and discussions with NCMEC, I know that this particular image was

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<sup>3</sup> Later in this interview, Woody admitted that he created the superimposed title over this child-pornographic image and that he made up the title. When shown the image that bore that label, Woody agreed that it was a prepubescent child performing oral sex (oral to genital intercourse) on an adult and stated, “Fair enough.”

contained in CyberTip report #45890223 and further that it was uploaded over the internet to a particular social media application platform during the period between January 22, 2019 and January 23, 2019<sup>4</sup>.

c. Woody stated that he would get the money from these sales using a cash app like Venmo or CashApp. He found customers for these sales on T\_\_\_\_\_ (which I know to be a popular website). He negotiated prices with customers, and would say like, “a 100 videos for \$100.” Some customers would counteroffer. Some customers would make special requests such as 5-year olds. Woody recognized that the name “M\_\_\_\_\_ E\_\_\_\_\_” and was told that he was a suspect in a child abuse case. Woody said that one video could bring \$20. Woody would make small sales to pay for his routine living expenses, such as Lyft rides or food, to supplement his income. Woody denied having videos, and admitted that he lied to some of his customers. When asked how many potential customers that

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<sup>4</sup> I have also received and reviewed a screenshot of a particular image provided to me by Detective Ellis, who had received it in a CyberTip. This image was a collage of 15 smaller images, several of which appeared to depict minors engaged in sexually explicit conduct. For example, one of the smaller images depicts an adult penis attempting to penetrate the anus of a minor child. I believe this person to be a minor child based upon the child-sized buttocks as compared to the size of the adult’s penis, hand, lower abdomen, and upper legs. This image had the label “got them young vid\$ [App]freakynasty951 \$serious buyer\$ only!” superimposed on its lower portion. I later confirmed that this collage image was contained in CyberTip #45890223 (referred to above) and further that it was uploaded over the internet to a particular social media application platform during the period between January 22, 2019 and January 23, 2019.

he lied to and took their money, he said, "10 or 15." He claimed that he never actually sent a video or picture. However, Woody stated that he would take a picture of a picture that he saw on T\_\_\_\_\_ and would say that he had it. He agreed that he would put his App handle superimposed over the child-pornographic image and say "Hey, hit me up on [App] and I can sell you child pornography," and potential buyers would then go to the App where the transaction would occur. Woody stated, "Right, they would send me money." He saved these images from T\_\_\_\_\_ to his laptop, superimposed his App handle on them, re-posted them and said that he had the image and "hey I got it, can you send me some money?" The buyers would hit him up, send him the money, and he did not have to do anything else. Woody stated that was "honestly" how he paid for his rides (on Lyft), for food, and for his rent. He denied producing the images, touching any child, or secretly recording children.

d. Woody got all of the child-pornographic images from T\_\_\_\_\_. He would type terms such as "public fun." That term works because T\_\_\_\_\_ enables users to search for specific terms. He would search "public fun" and then look for users who "liked" it and follow to their pages. When asked how to find images of somebody having sex with a toddler, Woody suggested that one might search "weird names" such as "table floor." Woody stated that one could "probably" find child pornography using tags for weird terms. Woody said that he

“personally” had seen a total of about two or three child pornography files on T\_\_\_\_. Detective Ellis showed Woody some of the CyberTip information from T\_\_\_\_ that had alerted law enforcement through NCMEC. Woody was shown the report from the “Dalmatians” series (which I know to be a well-known series of images depicting child pornography), and the detective discussed Woody trading images of child pornography. Woody denied “physically” sending child pornography videos. However, Woody admitted receiving child pornography from “Alex” when he (Woody) lived off Golfair Boulevard. He denied receiving child pornography on T\_\_\_\_. He again denied sending child pornography and was confronted with the number of “uploaded files” attributable to him on T\_\_\_\_, including some videos and some images, that triggered the CyberTip. I explained that after he downloaded from T\_\_\_\_, he put his “advertisement or notice” on the image and uploaded it back to T\_\_\_\_, it triggered the CyberTip. Woody admitted that this type of material is “definitely harmful to children, yeah.” Woody acknowledged putting these images with “notices and advertisements” on T\_\_\_\_, and I told Woody that these images depicted real children have been rescued and identified. Woody admitted that the images that he uploaded depicted children that were younger than 18 years of age. I explained the efforts that law enforcement make rescue these children and Woody agreed that such efforts were worthwhile.

When asked “are you in these images, or are you just seeking child pornography to sell it,” Woody responded, “I’m just, I’m just making money.”

e. Woody stated that his laptop was at the pawn shop, and he did not know if there would be “remnants” of child pornography on it and that he was not sure. He admitted that he used his laptop to “do this,” referring to the downloading, marking, and advertising the images of child pornography. Woody denied being depicted in the images. When asked how he found out that “there was money in this,” Woody explained that he was offered child pornography by “the guy” and he (Woody) declined to buy it. But then, he said “I was like, hold up ... I need a ride to work or, you know, just, just anything, you know, that, wash clothes, anything, well, I was like, ‘ok, I’m fixin’ to say that I got ‘em’... [ ] just send me some money.” Woody acknowledged that it was “definitely wrong” and that it was not fair to those who actually paid him money. Woody said, “my whole thing is, just send me some money, so I can do this or ...”

f. Woody was shown another image depicting what I believe to be a minor child (based on his child-like facial features and relative body size) with a penis in his mouth and Woody said, “I guess that’s the same as the other guy in the shower or something, I don’t know.” This image also had the superimposed label that read, “\$on \$ucking dad [App] freakynasty51 for \$ale”. Based on my review of

the CyberTip information as set forth above and discussions with NCMEC, I know that this particular image was contained in CyberTip report #44379495 and further that it was uploaded over the internet to a particular social media application platform during the period between between December 8, 2018 and December 10, 2018. He was shown other child-pornographic images and stated that he was making the images “sound good” with these titles because “the people that were sending their money, that’s what they wanted.” He had a few people complain to the bank and claim that this was a “like a fraudulent transaction, so to speak, because I didn’t actually send them anything.” His bank account at Axiom is “in the negative” because “somebody got their money back.” Woody was confronted by the fact that he was taking money from people who exploit children. He remarked, “So I’m just as bad as they are.” He said, “I never, never ever thought that, you know, um, I would feel like ... such a ... horrible person ... but, you know, the way you’re putting it ...” He added, “At the time, you, it was just, shoot, ‘you need a bus ride .... you need to wash your clothes ‘cause you stink ...’” Woody stated that he received a job offer from the Philippines and he told the person that he was “sick” and blocked him. He stated, “So in my mind, you know, I’m not, you know, um, that monstrous person.” He denied being “interested” in child pornography, and denied ever sexually abusing a child, saying “I don’t think my mind is that far off.”

g. Woody denied currently having any child pornography on his cell phone. When asked if he would allow the agents to look at his phone, Woody said, "Sure." He gave the password to his phone as a "sideways S." Detective Ellis read a consent to search form to Woody, and Woody executed the form.

h. While Detective Ellis took the phone to the forensic reviewer in the parking lot of the supermarket, Woody continued to speak with me. Woody seemed to understand that he was helping to facilitate the sexual abuse of children by offering child pornography for sale. He understood that his potential customers wanted proof and that he was giving them a "taste" of the "product" by posting the "ad" on top of an image of child pornography. He agreed that he was giving his online customers the impression that he had child pornography. Woody met "A\_\_\_\_\_ S\_\_\_\_\_" on T\_\_\_\_\_ and got the idea of downloading child pornography and then offering it for sale online from him (A\_\_\_\_\_ S\_\_\_\_\_). He said that at least "one guy" got his money back after a transaction.

i. Woody was asked about access to his laptop computer, and he said that it would cost \$50 to get it from the pawn shop. He did not have the funds to pay for it. I showed him the post about his interest in "seeing small type holes getting bashed in," and Woody reluctantly acknowledged that it could be interpreted that he was talking about children. He said that he was interested in males 17-21 years old. In response to that posting, Woody was sent an image of a toddler being

raped. He reluctantly acknowledged in substance that there was a high likelihood that people would interpret his posting as requesting images of very young children. He was shown documents in which he negotiated prices for child pornography and I told him that it appeared that he did it a lot. He again denied being sexually attracted to children. He did acknowledge that his conduct might lead people to believe that he was a pedophile. Woody stated that he knew that child pornography was illegal and that it should be illegal. Woody denied being in the pictures of child pornography and denied being a pedophile. He remarked that he just needed money for bus rides or to wash his clothes.

j. Woody said that some of his customers got their money back, and I told him that was because he had committed fraud and tricked them. Woody replied, "Well, I mean, I'd rather ... I'd honestly rather say that ... I committed fraud than to say that I was selling child porn." I asked Woody if he was advertising to sell child pornography, and Woody responded, "I was advertising ... so, I mean, I guess you can say, you know, whether I had it or not, you know, I advertised that I had it [referring to child pornography] ..."

k. Woody discussed his living situation and his finances in some detail. He claimed that this [money from selling child pornography] was income but not a full-time job. Woody remarked, "So I'm just a horrible person. It's ... it almost makes it seem like I'm just as bad as they (the buyers) are or something." He

understood that what he did was wrong and discussed typing the ads over images, committing fraud. I pointed out that he superimposed the advertisement or notice on top of images of child pornography, and Woody replied, "I get what you're saying." Woody went on to discuss his finances and working to sell other things. He stated that he had been "100 percent honest." When he was asked if he would consent to a search of his App account, he agreed but said that his account had been closed for violation of terms of service.

1. A forensic examiner with CCSO conducted a search of Woody's mobile telephone and recovered a video titled "New! (pthc) V-Marsh-airvideo.m4v." The forensic examiner Detective Ellis that the video depicted a fully nude minor female lying on her back on a bed with her genitalia exposed in a lascivious manner with a male individual performing oral sex on the female child. I later read a description of this video and learned it was 35 seconds in length.

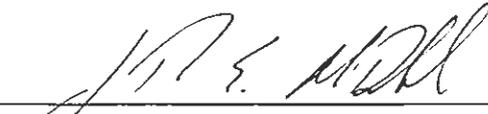
m. After the conclusion of the interview, Woody was arrested by the CCSO for possession of child pornography.

14. I have also reviewed a series of screen shots received by Detective Ellis that were sent to him by Broward County Sheriff's Office Detective Erica Rockey. Detective Ellis advised me in substance that Detective Rockey had forwarded these screen shots because she had learned about our investigation of the App user whom we later identified as Antony Eugene Woody as set forth above and herein. These

screen shots included those from an undercover conversation between a law enforcement officer and the user “imsoofreakyy” on the App that involved the attempt to purchase child pornography from the user “imsoofreakyy”. One of these screen shots contained information showing that the user “imsoofreakyy” also listed his “handle” as “new[App] freakynasty951”.

15. Based upon the facts set forth above herein, I have probable cause to believe that during the period from on or about December 8, 2018 through on or about January 23, 2019, in the Middle District of Florida, ANTONY EUGENE WOODY, did knowingly make, print and publish, and cause to be made, printed, and published notices and advertisements seeking and offering to exchange, display, distribute, and reproduce any visual depictions, the production of which visual depictions involved the use of minors 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).

  
\_\_\_\_\_  
JONATHAN S. MACDONALD  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this  
27 day of August, 2019, at Jacksonville, Florida.

  
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JOEL B. TOOMEY  
United States Magistrate Judge