

AO 91 (Rev. 11/11) Criminal Complaint

FILED IN OPEN COURT

9/26/2019

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

CLERK, U. S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

United States of America)

v.)

SANJAY LAMA)

Case No.

3:19-mj- 1350-JRK

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 September 25, 2019 in the county of Duval in the Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2422(b)

Attempted online enticement of a minor to engage in illegal sexual activity

This criminal complaint is based on these facts:

see attached affidavit.

Continued on the attached sheet.

Complainant's signature

Special Agent Daniel R. Moxley, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 9-26-19

City and state: Jacksonville, Florida

Judge's signature

James R. Klindt, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Daniel Moxley, being duly sworn, state as follows:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since July 2017. I am currently assigned to the Jacksonville, Florida Division of the FBI, where I conduct investigations in the area of child pornography. Prior to this assignment, I was employed as an Intelligence Analyst and Management and Program Analyst for the FBI for approximately 7 years. I have Bachelor's Degrees in Economics and Political Science. 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 and solicitation for, possession, collection, production, receipt, and/or transportation of images of child pornography. I have been involved in searches of residences pertaining to the possession, collection, production, and/or transportation of child pornography through the execution of search warrants.

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.

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§§ 2251, 2252, and 2422(b), among other federal and state law violations. 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 information I obtained from my own personal observations from participating in this investigation, reviewing an investigative report, reviewing the transcripts of the online conversation between FBI SA Dustin Grant and SANJAY LAMA on September 25, 2019, and from information directly provided to me by 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 SANJAY LAMA has committed a violation of Title 18, United States Code, Section 2422(b), that is, attempted online enticement of a minor to engage in illegal sexual activity.

4. I make this affidavit in support of a criminal complaint against SANJAY LAMA, a/k/a "Awesome_Jack," that is, on September 25, 2019, in the Middle District of Florida, SANJAY LAMA, a/k/a "Awesome_Jack," using a facility of interstate commerce, that is, by cellular telephone and computer via the internet, did knowingly and willfully attempt to persuade, induce, entice, and coerce

a person whom SANJAY LAMA believed had not reached the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense under the laws of the state of Florida, that is, the crime of lewd or lascivious battery upon a person 12 years of age or older but less than 16 years of age, in violation of Sections 800.04(4)(a), Florida Statutes, all in violation of Title 18, United States Code, Section 2422(b).

5. On September 25, 2019, SA Dustin Grant, while located in the FBI field office in Jacksonville, Florida, was acting in the capacity of an undercover persona and began conducting an online undercover operation designed to identify and target adult individuals who were seeking to make contact with and engage in illegal sexual activity with minor children. I was present in the same office with SA Grant during this investigation and he provided me with information as the investigation unfolded. While working online in an undercover capacity, SA Grant created an online post using a particular social media application ("app"). Based on my training and experience, I know that this particular app allows individual users to meet online, engage in conversation through private messages, and share photographs. I also know that this app has been used by individuals who seek to identify other individuals who are interested in meeting for sexual activity.

6. On September 25, 2019, SA Grant posted a photo on this app site that depicted, in part, a pregnant female. This photo had a label that referenced youth

and pregnancy. In this investigation and during his online communications with the user "Awesome_Jack," who was later identified as LAMA, SA Grant planned to, and did in fact assume the persona of a 12 year old pregnant female.

7. Also on September 25, 2019, an individual using the user name "Awesome_Jack" responded to SA Grant's notice and contacted SA Grant's undercover persona through private message of this app. SA Grant and "Awesome_Jack" exchanged several private messages throughout the day. SA Grant made copies of and preserved as evidence the photos and the private messages exchanged between SA Grant (referred to as the "UC") and "Awesome_Jack", later identified as LAMA.

8. Also on September 25, 2019, I reviewed the transcripts, the form of screen shots, of the online conversation between SA Grant and "Awesome_Jack" that occurred on the same day and learned the following:

Awesome_Jack: "How old"

UC: "I'm almost 13"

Awesome_Jack: "Oh"

Awesome_Jack: "Who is the father"

UC: "Some asshole that's not with me"

Awesome_Jack: "That's fucked up"

Awesome_Jack: "What do u look like"

UC: [sends an image of a young looking female in what appears to be a classroom]

Awesome_Jack: "U look older"

Awesome_Jack: "Do u wanna meet"

UC: "Ok and do what"

Awesome_Jack: "Talk"

Awesome_Jack: "I wanna talk to u what Happened"

Awesome_Jack: "I get off at 4.30"

UC: "Just talking?"

Awesome_Jack: "Why do u want something else"

UC: "I'm open"

Awesome_Jack: "Sure"

Awesome_Jack: "Don't u have to be home.. won't ur parents be worried"

Awesome_Jack: "At 5"

UC: "I live with my grandma"

Awesome_Jack: "Okay.. what's ur name?"

Awesome_Jack: "Where do u live?"

UC: "Brittini"

UC: "Near St. John's town center"

Awesome_Jack: "Okay"

Awesome_Jack: "Can I have ur number"

JRK

Awesome_Jack: "What r u doing now?"

UC: "Just at school"

UC: "What wud we do"

Awesome_Jack: "Idk. Lol. Do u wanna go anywhere?"

Awesome_Jack: "Can u invite me at ur place?"

Awesome_Jack: "Or we can goto mall"

Awesome_Jack: "Or at the beach"

UC: "I can see when my grandma will be gone"

UC: "What else did u want to do"

Awesome_Jack: "Talk and talk"

Awesome_Jack: "U need some guidance"

Awesome_Jack: "Lol"

Awesome_Jack: "Make u do stuff"

Awesome_Jack: "What grade r u in"

UC: "Im in 7"

UC: "Make me do stuff lol u sound like a bad boy"

UC: "How old r u?"

Awesome_Jack: "26"

Awesome_Jack: "I meant like make u give me massage.."

Awesome_Jack: "Nothing sexual. U r underage"

JRK

Awesome_Jack: "Lol. Hehe"

UC: "Oh what type of massage, I've heard that before"

UC: "Y u say I'm underage"

Awesome_Jack: "U r almost 13"

Awesome_Jack: "I was just kidding about massage"

Awesome_Jack: "We will see."

Awesome_Jack: "What's ur number Dear?"

UC: "Just be honest bout what u want, plus I'm not comfortable w giving u my number"

UC: "The last guy stalked me and I had to change it"

Awesome_Jack: "Make u sit on my lap"

Awesome_Jack: "And bend u over and spank I"

Awesome_Jack: "U"

Awesome_Jack: "Maybe make u use ur mouth"

UC: "Use my mouth, how"

Awesome_Jack: "Bj"

UC: "lol what if im not good"

Awesome_Jack: "Then make u work. More"

Awesome_Jack: "Practice"

UC: "Oh like what kind of practice"

Awesome_Jack: "Bj practice"

Awesome_Jack: "Over and over"

UC: "Like how wud I do that lol not sure how to be good"

UC: "And u want only BJs?"

Awesome_Jack: "I mean. I love it"

Awesome_Jack: "But if u want more I can give it to u"

UC: "Like how lol"

Awesome_Jack: "Sex."

Awesome_Jack: "Creampie again"

Awesome_Jack: "Anal"

UC: "What's a cream pie"

UC: "Sounds weird"

UC: "But I'm open"

UC: "I get out of school around 300"

Awesome_Jack: "Okay"

Awesome_Jack: "How do u get home?"

Awesome_Jack: "I get off around 4.30"

UC: "I walk"

Awesome_Jack: "Xan u hang out with me around 5?"

Awesome_Jack: "Okay"

UC: "Let me c"

Awesome_Jack: "Okay"

Awesome_Jack: "Can i see a different pic of u?"

UC: "Like what kind of pic"

Awesome_Jack: "Any type."

Awesome_Jack: "Clean and not clean"

UC: "I feel fat and I hate sending pics"

UC: "Where wud u pick me up, I live near this mall"

Awesome_Jack: "What mall"

Awesome_Jack: "Do you like riding motorcycles"

UC: "Yes"

UC: "I think it's called St Johns Town Center"

Awesome_Jack: "Okay"

Awesome_Jack: "Where will u be"

Awesome_Jack: "I will be there around 5"

Awesome_Jack: "What store"

Awesome_Jack: "What will u be wearing?"

Awesome_Jack: "So I know it's u"

UC: "Im wearing a blue shirt"

UC: "There's like a Dick Sporting goods and a Nordstrom's"

UC: "Like what do u look like?"

JAK

Awesome_Jack: "Asian"

UC: "Cute"

Awesome_Jack: "I wil be wearing black jacket with black and red helmet"

UC: "Cool"

UC: "Where should we go"

Awesome_Jack: "To the park"

Awesome_Jack: "Near beach"

Awesome_Jack: "So we r meeting at Dick's or Nordstrom"

Awesome_Jack: "Can we goto ur place?"

Awesome_Jack: "So we r meeting at Dick's or Norstrom"

UC: "Ok Dicks"

UC: "So no one will be at my grandmas house"

Awesome_Jack: "Do u wanna go there?"

Awesome_Jack: "At ur grandma?"

UC: "Sure"

UC: "She won't be home for a while"

Awesome_Jack: "Do you have the key"

Awesome_Jack: "What time she will be back?"

UC: "Yes"

UC: "I think 7"

Awesome_Jack: "So do i pick you up at Dick's out just come at ur grandma house directly"

Awesome_Jack: "Or just*"

UC: "Yes"

Awesome_Jack: "Okay love"

Awesome_Jack: "Wbere do you goto school?"

UC: "I'm part time at Twin Lakes, I just moved here"

Awesome_Jack: "Oh okay"

UC: "If u don't want to meet cuz I'm young I wud understand"

Awesome_Jack: "Where did u move from? Where is ur parents at"

Awesome_Jack: "Aren't u scared to meet random people from stranger? What if u get kidnapped?"

UC: "Utah"

UC: "Parents disown me"

Awesome_Jack: "From online*"

Awesome_Jack: "What did u do?"

UC: "I hope u aren't going to fucking kidnap me"

Awesome_Jack: "Lol. Not a motorcycle."

Awesome_Jack: "Not on a motorcycle. I won't. But I am not a kidnapper"

UC: "Well I'm tough lol"

Awesome_Jack: "U r young, sounds like me little sister"

UC: "Oh sry"

Awesome_Jack: "Just want to take care of i"

Awesome_Jack: "Sorry why?"

UC: "I wish I was older"

Awesome_Jack: "U r fine..i will still meet u"

Awesome_Jack: "And goto ur grandma house"

Awesome_Jack: "Are u okay with that?"

UC: Yeah I just don't want to do anal"

Awesome_Jack: "Okay"

Awesome_Jack: "Can I come inside?"

UC: "Like come inside my grandmas house?"

Awesome_Jack: "No. Like cum inside your pussy"

UC: "Oh. Lol yes that's fine but shouldn't u have a condom just in case"

UC: "Can I pregnant again?"

Awesome_Jack: "If u r pregnant already u can't get double pregnant"

Awesome_Jack: "When did u have sex and with who?"

UC: "Old bf"

Awesome_Jack: "Damn. Okay"

Awesome_Jack: "How do u know u r pregnant"

UC: "I took a test"

JAK

Awesome_Jack: "Okay."

Awesome_Jack: "I will meet u at Dicks at 5 or before."

Awesome_Jack: "Do u live closeby?"

Awesome_Jack: "How long is the walk to Dicks from ur apartment"

UC: "I cud be over at Dicks earlier too"

UC: "Yes I live in a town house next to them"

UC: "Maybe 10 mins"

UC: "Where do u work at"

Awesome_Jack: "Downtown"

Awesome_Jack: "22 mins to get there"

Awesome_Jack: "I get off at 4.30 so I will get there by 5"

Awesome_Jack: "How tall are you"

UC: "Oh ok"

UC: "Idk maybe 4 10"

UC: "I'm short"

Awesome_Jack: "That's fine"

Awesome_Jack: "U r cute"

UC: "Thx"

UC: "Can I c wat u look like?"

Awesome_Jack: [sends an image of a male wearing sunglasses in an outside setting¹]

Awesome_Jack: "Can i see ur different pic. I like it"

UC: "Cute"

Awesome_Jack: "Show me another pic, if u can."

UC: [sends an image of a young female in a bathroom setting]

Awesome_Jack: "Okay thanks."

UC: "I don't look cute at all"

Awesome_Jack: "U look amazing"

Awesome_Jack: "Beautiful.."

Awesome_Jack: "What r u looking for?"

Awesome_Jack: "Just sex? Or bf? Or friends?"

UC: "Thx I'm fine with both u tell me"

Awesome_Jack: "I just want sex with u.. and make u my personal sex slave. Lol"

Awesome_Jack: "U r pretty beautiful and sexy"

UC: "Ok we will see, what does a sex slave do lol"

Awesome_Jack: "Idk. Just whatever the guy wants to do. It can be with or without consent."

¹ I have reviewed this image and I participated in the post-arrest interview of LAMA and I am now familiar with his appearance. It appears that this image depicts LAMA. In a subsequent consent search of LAMA's cellular telephone, I located this image on the phone.

UC: "Oh"

Awesome_Jack: "Lol. Not that scary. U can read up online"

Awesome_Jack: "Sex slave bdsm. I have never tried it before"

Awesome_Jack: "Lol"

UC: "Oh well what did u mean by that then"

Awesome_Jack: "Just want to have sex with u unconditionally"

Awesome_Jack: "I guess."

UC: "Lol ok"

Awesome_Jack: "Okay"

Awesome_Jack: "Why did ur parents disown u?"

UC: "Didn't like my bf"

UC: "Too hard to handle"

UC: "I'm a rebel"

Awesome_Jack: "Damn okay"

Awesome_Jack: "Miss rebel"

Awesome_Jack: "R u off already?"

UC: "Yeah"

UC: "R u off work"

Awesome_Jack: "Almost"

Awesome_Jack: "Be there around 5 or early okay.."

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Awesome_Jack: "Where are u going to stand..stand in shade okay."

Awesome_Jack: "I am leaving now. Be there at 5 or before.."

UC: "Ok I might just hang out inside to cool off"

UC: "It's hot"

Awesome_Jack: "I know."

Awesome_Jack: "See u. What r u wearing again"

UC: "Blue shirt and graying pants"

UC: "Super cute [emoji sent depicting monkey covering face]"

UC: "Lol"

Awesome_Jack: "Lol. Ok. Coming."

UC: [emoji sent depicting thumbs up]

Awesome_Jack: "1 min"

UC: "K I'm inside"

Awesome_Jack: "Hate"

Awesome_Jack: "Hare"

Awesome_Jack: "Here*"

UC: "Oh where"

Awesome_Jack: "M outside on the street where j crew and Victoria secret is"

UC: "I don't know where that is I think by the other side there's like a field"

Awesome_Jack: "I am coming to di ks"

UC: "Ok let me know"

Awesome_Jack: "I am here"

Awesome_Jack: "Where are you inside"

UC: "R u on a motorcycle?"

Awesome_Jack: "I was"

Awesome_Jack: "Parked on the side"

Awesome_Jack: "Where are you now m"

Awesome_Jack: "I am inside Dick's"

UC: "Oh I'm outside"

Awesome_Jack: "Where"

Awesome_Jack: "In the parking lot?"

9. I and other FBI Special Agents traveled to a predetermined shopping area at the St. Johns Town Center that had been agreed upon and discussed by LAMA and UC in their online conversation, and this was done in an effort to locate and make contact with LAMA.

10. On September 25, 2019 at approximately 5:00 p.m., I observed an Asian male using a cellular telephone while wearing a black jacket and carrying a red and black motorcycle helmet in front of the predetermined location. At that point, FBI agents made contact with LAMA and placed him under arrest. During the arrest, LAMA disobeyed the commands from the agents, turned his back toward the

agents, moved away from the agents, and appeared to be manipulating his cellular telephone. It became necessary to remove the phone from his possession and forcibly take him to the ground. During this process, LAMA continued to resist the agents until he was finally placed in handcuffs.

11. LAMA was transported in custody to the FBI Jacksonville Field Office, located at 6061 Gate Parkway, Jacksonville, Florida 32256. Shortly thereafter, SA Grant and I met with LAMA for an interview. This interview was recorded on audio. After being advised of his constitutional rights, LAMA acknowledged his rights, executed a written waiver of his rights, and agreed to speak with us. During this interview, LAMA stated, in summary and among other things, that he had responded to the notice posted by the female (UC), he had engaged in sexual conversations with UC, and he traveled to the particular predetermined location. LAMA claimed that he knew "it was fake," and claimed that he was being scammed and further that he did not think he would be meeting an underage child. He claimed that he traveled to the meeting location because he was trying to figure out what kind of "scam" this was. He denied having any sexual interest in children. He claimed that if upon arrival he discovered that the "child" was real, that he would have probably called the police. He consented to a search of his Pixel 3 cellular telephone. He stated, "Next time I'll call the police." LAMA acknowledged that soliciting a child was illegal. He claimed that he came to the meeting location


because he had “nothing else to do” and he had just moved here (to Jacksonville). LAMA stated that he was “sure” that this was a “scam.” At the conclusion of the interview, LAMA agreed that he had been treated fairly by the agents.

12. Based upon the foregoing facts, I have probable cause to believe that on September 25, 2019, in the Middle District of Florida, SANJAY LAMA, a/k/a “Awesome_Jack,” using a facility of interstate commerce, that is, by computer via the internet and cellular telephone, did knowingly and willfully attempt to persuade, induce, entice, and coerce a person whom LAMA believed had not reached the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense under the laws of the state of Florida, that is, the crime of lewd or lascivious battery upon a person 12 years of age or older but less than 16 years of age, in violation of Section 800.04(4)(a), Florida Statutes, all in violation of Title 18, United States Code, Section 2422(b).



DANIEL R. MOXLEY, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 26th day of September, 2019, at Jacksonville, Florida.



JAMES R. KLINDT
United States Magistrate Judge