

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Case No. 3:20-mj- 1190-J-JRK

TRAVIS RYAN PRITCHARD

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Between in or about December 2019, and on or about May 2, 2020, in the Middle District of Florida, and elsewhere, the defendant, TRAVIS RYAN PRITCHARD,

did knowingly persuade, induce, entice, and coerce and attempt to persuade, induce, entice, and coerce a person who 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 18 U.S.C. § 2422(b). I further state that I am a Special Agent with Homeland Security Investigations, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No


Signature of Complainant
BENJAMIN J. LUEDKE

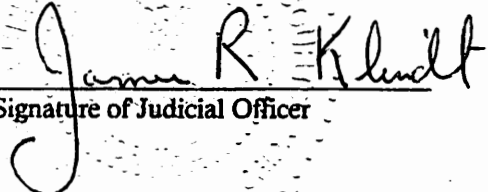
Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim. P. 4.1 and 4(d)

on May 11, 2020

at

Jacksonville, Florida

JAMES R. KLINDT
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Benjamin J. Luedke, being duly sworn, state as follows:

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), the investigative arm of Immigration and Customs Enforcement (ICE), formerly known as the United States Customs Service. I have been assigned to the Office of the Assistant Special Agent in Charge, Jacksonville, Florida since August 2007. Prior to that, I was assigned to the Blaine, Washington office, beginning in July of 2002. I am a law enforcement officer of the United States and am thus authorized by law to engage in or supervise the prevention, detection, investigation or prosecution of violations of federal criminal law. I am responsible for enforcing federal criminal statutes under the jurisdiction of HSI, including violations of law involving the exploitation of children. I have attended the Basic Criminal Investigator School and the United States Immigration and Customs Enforcement Academy at the Federal Law Enforcement Training Center in Brunswick, Georgia, and I have received training in the area of Customs laws. In my capacity as a Special Agent, I have participated in numerous types of investigations, during the course of which I have conducted or participated in physical surveillance, undercover transactions and operations, historical investigations, extradition cases and other complex investigations. Prior to my employment with HSI, I worked as a federal police officer with the U.S. Capitol Police from June 2000 to March 2002. Since becoming a Special Agent, I have worked with experienced Special Agents and state and local law enforcement officers who also

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investigate child exploitation offenses.

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 sexual activity with minors and other methods of child sexual exploitation. In connection with such investigations, I have served as case agent and have served as an undercover agent in online child exploitation cases. Specifically, during the course of my official duties, I have assumed the persona of a minor child or an adult relative of a minor child and engaged in online conversations with adult individuals who expressed interest in engaging in illegal sexual activity with minor children. During the course of my investigations, I have worked closely with members of the local child exploitation task force comprised of agents and officers from HSI, the Federal Bureau of Investigation (FBI), the Jacksonville Sheriff's Office (JSO), the St. Johns County Sheriff's Office (SJSO), and the Clay County Sheriff's Office (CCSO), 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, reports I have reviewed and facts I learned from meeting and communicating with other law enforcement officers and personnel involved in this investigation. 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 TRAVIS RYAN PRITCHARD has committed a violation of 18 U.S.C. § 2422(b), that is, online enticement of a minor and attempted online enticement of a minor.

4. I make this affidavit in support of a criminal complaint against TRAVIS RYAN PRITCHARD, that is, during the period from in or about December 2019, through on or about May 2, 2020, in the Middle District of Florida, PRITCHARD, using a facility of interstate commerce, that is, by cellular telephone, did knowingly persuade, induce, entice, and coerce and attempt to persuade, induce, entice, and coerce a person who 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 18 U.S.C. § 2422(b).

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5. On or about May 4, 2020, I spoke with Green Cove Springs Police Department (GCSPD) Detective (Det.) Douglas Patterson regarding an ongoing investigation of TRAVIS RYAN PRITCHARD for violations of Florida statutes involving child sexual exploitation. The investigation resulted in the issuance of a Florida state arrest warrant for PRITCHARD and his subsequent arrest by GCSPD on May 2, 2020.

6. On May 6, 2020, I met with Det. Patterson, as well as Det. Erin Vineyard, Lieutenant (Lt.) Elvis Guzman, Sergeant (Sgt.) Tammy Perry, and Chief Derek Asdot and discussed the details of this investigation. I also was provided reports authored in the investigation, which I have reviewed. I was advised of, in substance and among other things, the following:

- a. On April 29, 2020, Lt. Hines, Lt. Guzman, and Sgt. Perry responded to an address in Green Cove Springs, Florida in reference to a complaint that TRAVIS RYAN PRITCHARD was allegedly having sexual relations with a 15-year-old juvenile, herein referred to as Minor Victim 1 (MV1). Upon arrival at MV1's residence, Lt. Hines spoke with MV1's mother who subsequently provided information she received about her daughter having sexual relations with an adult male believed to be a Deputy Sheriff with the Clay County Sheriff's Office. Sgt. Perry, with the mother's permission, subsequently contacted MV1 inside the residence

and conducted a preliminary interview. During this preliminary interview, MV1 provided, in substance and among other things, the following information:

- b. MV1 advised she met PRITCHARD at the beginning of the current school year (August 2019) at a convenience store in Green Cove Springs, Florida, which is in close proximity to MV1's school. MV1 advised she would meet a family member at the convenience store after school on a daily basis. MV1 advised that PRITCHARD would pick up his son from the same location after school. MV1 advised that at some point, she and PRITCHARD exchanged contact information via a popular online chat application, herein referred to as "The Chat Application." MV1 advised PRITCHARD told her they could be like "family friends" and he would help her with her homework when she needed it. MV1 advised that she and PRITCHARD began communicating through The Chat Application and, in December 2019, PRITCHARD asked MV1 to send him a nude picture of herself. MV1 advised that she did not feel comfortable at first but, after some time, she sent him a picture of her bare chest via The Chat Application. MV1 advised she sent PRITCHARD similar photos over a dozen times. MV1 also advised PRITCHARD sent her nude photos of his erect penis on approximately ten (10) occasions and also sent her one

(1) picture of his bare buttocks. MV1 advised she told PRITCHARD she was fifteen (15) years of age prior to them having sexual intercourse. MV1 advised she thought PRITCHARD was 34 or 35 years old. MV1 advised PRITCHARD told her she could never tell anyone about him because he could lose his family, his job and get in trouble with the military. MV1 advised PRITCHARD told her they could never be in a relationship and for her to never tell him that she loved him because of her age. MV1 advised that, during December 2019, PRITCHARD came over to her residence in Green Cove Springs after all the adults at MV1's residence were asleep and entered her bedroom through the window. MV1 advised she and PRITCHARD spoke for a little while before having sexual intercourse. MV1 advised that sexual encounters between she and PRITCHARD continued on a weekly basis until April 27, 2020. MV1 advised that, during this time period, PRITCHARD typically arrived at her residence between the hours of midnight and 2:00am and would stay for approximately one hour. MV1 advised that during the weekly sexual encounters with PRITCHARD, he would always enter the home through her bedroom window. MV1 advised PRITCHARD never wore any protection during sexual intercourse and explained to MV1 that he had had a vasectomy. MV1 advised that PRITCHARD always ejaculated

inside her vagina and they always had vaginal/penile sexual intercourse. MV1 advised that PRITCHARD performed oral sex on her on multiple occasions. MV1 advised that the sexual encounters with PRITCHARD always occurred in her bedroom, on her bed. MV1 showed Sgt. Perry a Chat Application video time stamped at 2:12am on April 27, 2020 that MV1 took of PRITCHARD while PRITCHARD was in her bedroom. MV1 also had a still picture of PRITCHARD in her room with the same time stamp. In the video and image, which I have viewed, PRITCHARD appears to be sitting on MV1's bed. I have viewed additional photographs of MV1's room taken by Lt. Hines on April 29, and the background of the photo and video taken by MV1 match the photographs taken by Lt. Hines of MV1's bedroom. In addition, Sgt. Perry advised she personally knows PRITCHARD through work and positively identified him as being a Deputy currently assigned to the DUI unit with the Clay County Sheriffs Office. MV1 showed Sgt. Perry a photo PRITCHARD posted using The Chat Application twenty-two (22) hours before this event and he was wearing his Clay County Sheriffs Office uniform. I have viewed this photograph as well. While Sgt. Perry was bringing MV1 to the police station to conduct a more in-depth interview, PRITCHARD sent MV1 a message via The Chat application. The message, which I have viewed,

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is, according to MV1, a photo represented to be of PRITCHARD's bedroom with the message "Good morning" in text across the photo. MV1 advised it is normal for PRITCHARD to send her a picture when he wakes up and it appears to be from his bedroom. Sgt. Perry observed MV1's Chat Application account and it revealed PRITCHARD messaged MV1 on 63 consecutive days.

7. At this point on the same day, April 29, 2020, the mother of MV1 provided written consent to search MV1's phone and verbal consent to assume MV1's Chat Application identity. GCSPD Detective (Det.) Vineyard subsequently took custody of the phone and obtained Chat Application information from MV1 and began messaging with PRITCHARD. Det. Vineyard took a photo of PRITCHARD's contact information found within the contacts of MV1's phone. The contact was displayed as "Travis Pritchard." Det. Vineyard then accessed The Chat Application and identified PRITCHARD's username as "trpritch." At approximately 5:00pm, Det. Vineyard, acting in an undercover capacity using the identity of MV1, began messaging with PRITCHARD. PRITCHARD sent an image of himself laying in a bed, which according to MV1 is a typical good morning message from PRITCHARD. Messaging continued and, at approximately 8:18pm, Det. Vineyard texted, "Hey are you still able to come over tonight." At approximately 8:23pm "trpritch" responded with a message that read, "I'm planning on it, babe." Det. Vineyard continued to

message with PRITCHARD throughout that evening, but no plans were made for PRITCHARD to come to MV1's house.

8. On April 30, 2020, at approximately 2:51pm, Det. Vineyard received the following message from PRITCHARD and messaging continued as follows:

PRITCHARD: FML I'm so sorry

Good news tho I'm not going to drill this weekend.

Det. Vineyard: it's ok

can you come over tonight?

PRITCHARD: yeah I should be able to make tonight happen. Hell, I slept for more than 12 hrs. I should be able to stay awake, lol

Det. Vineyard: Ok sounds good to me

You know what time

PRITCHARD: Not sure yet. Still out doing stuff

Det. Vineyard: Ok

How did you sleep

PRITCHARD: I slept too much haha

And prob around midnight or so

Det. Vineyard: Ok sounds good to me

PRITCHARD: [heart eye Emoji and wink Emoji blowing a heart kiss]

Det. Vineyard: Are you excited about later?

9. On May 1, 2020 at approximately 12:02am, Det. Vineyard received the following response from PRITCHARD to the last message above and messaging continued as follows:

PRITCHARD: I am

Det. Vineyard: What time

The following message was received by Det. Vineyard on the same day at approximately 11:43am:

PRITCHARD: [Emoji's of the frown face with downward eyebrows and red angry cuss face]

Det. Vineyard: Yeah

What happened

Good morning

PRITCHARD: Mornin. I have no idea. I was working on my military stuff on the computer. Trying to finish it up before the end of the month. And I guess I dozed off. I don't even remember getting up from the desk. Somehow ended up on my office couch. And I have a horrible migraine this morning

Det. Vineyard: What?

I'm sorry

You still off from drill?

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PRITCHARD: I am still off from drill. It's ok. I feel so bad. I get this way often where I just fall asleep. It's the result of a TBI from years ago. I was in therapy for it but this virus thing is keeping me away from the dr

Det. Vineyard: Is everything ok
I really thought you were coming over.

PRITCHARD: I really was going to. I have some issues that u don't know about. Things that make me fall asleep at random times and give me bad migraines. It's hard to control even with the medicine. But trust me when I say I miss u and really want to spend time with u. I just have little control over when these episodes happen

Det. Vineyard: Well can you come tonight? It's nice to know you miss me
[blue heart]
I miss you

PRITCHARD: I miss you too. I'm working tonight but we can meet somewhere

Det. Vineyard: What do you mean. This is new
Where would we meet?
While you're working. I don't know

PRITCHARD: There are places near ur house. Lol. We can at least get a quickie in

Det. Vineyard: Where what time? I mean it would make up for last night
[blue heart]

PRITCHARD: Lol absolutely. Would have to be after the sun went down.
And I'll look around. Most of my good hiding spots are out
of walking range for u

Det. Vineyard: Like how far
I can walk it's nice out

PRITCHARD: It's dangerous where u live tho. I'll go drive around later
and look

Det. Vineyard: OK
It's not that bad lmao

PRITCHARD: Lol ok
[A picture of what appears to be a male wearing gray
patterned boxer brief underwear with a blue waistband].

Det. Vineyard: [Blue heart] I like lol
I can't wait to see you later

PRITCHARD: [A video of himself in a Clay County Sheriff's Deputy
uniform, with a filter distorting his face and voice. In the

video PRITCHARD speaks about a call for service and shows his law enforcement computer screen with notes from a call for service. The notes are date and time stamped].

PRITCHARD: Same here babe

Det. Vineyard: Lmao!

I slept a little so I'm wide awake for later now

PRITCHARD: Great. Its going to be a good time

We both need this.

Det. Vineyard: After the last two nights!! Yes we do. Thought of a better time or place yet?

PRITCHARD: As long as it's a little later like 10 or 11. I'll keep an eye on gc screen and make sure they are busy.

Det. Vineyard: Sounds good

Find any good spots yet

PRITCHARD: Yeah there are a couple around there

Det. Vineyard: I can walk to it right?

PRITCHARD: Yeah.

Det. Vineyard: Ok it's almost 10. You thinking closer to 11?

PRITCHARD: Prob. Shit is going down atm in GC

Det. Vineyard: Really what's going on

PRITCHARD: [Name redacted] just stuck a gun to someones head

Det. Vineyard: Omg

PRITCHARD: Ikr

Det. Vineyard: Crazy

Well I' II wait

Still waiting for you to tell me where too

PRITCHARD: [4 angry cursing Emoji faces]

I'm gonna kill this mfer when I find him

Fucking [name redacted] just ran from me again

Det. Vineyard: Really? Ok

Should I go to bed or wait a little while

PRITCHARD: Just wait a sec

Det. Vineyard: Ok

PRITCHARD: Sorry

Det. Vineyard: I mean I'm sorry too, just feels like it's not gonna happen

But I'll wait

I'm not tired or anything

PRITCHARD: Okkk [Heart eye Emoji and wink Emoji blowing heart kiss]

Det. Vineyard: Worth the wait

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PRITCHARD: Aweee [5 wink Emojis blowing a heart kiss]

Det. Vineyard: Just let me know

10. On May 2, 2020, at approximately 1:56am, Det. Vineyard received the following response from her last message above and messaging continued as follows:

PRITCHARD: Just cleared the jail. I had to arrest someone. I'm sorry baby.

But I just cleared

Det. Vineyard: It's ok I'm here

PRITCHARD: Ok. Can u still sneak out for a lil bit?

Det. Vineyard: Yes!

Where I'm going

PRITCHARD: I'll send u a pin when I get there

Det. Vineyard: OK

?????

Whats taking so long? More work stuff

PRITCHARD: Yeah but Im on Robert's now looking for a place

Det. Vineyard: Ok

PRITCHARD: Want me to just clean oit my front seat and pick u up and we go somewhere real fast? So u don't have to walk but like to the end of the road?

Det. Vineyard: Towards Idlewild

Green cove av?

PRITCHARD: No like to the end of Roberts

I can pick u up there

Det. Vineyard: Oh ok

You ready now

PRITCHARD: Ok gimme a sec to move my bag

Det. Vineyard: Ok

Det. Vineyard: Which end?

PRITCHARD: The one closest to ur house

Det. Vineyard: Ok

Ready

PRITCHARD: I'm here

Det. Vineyard: Ok hang on

PRITCHARD: K

[An image of a computer screen showing Green Cove Springs Police Department asking for a DUI unit].

[Same image as above with "Grrr we gonna have to wait til Tmrw" followed by three sad face Emojis across the picture]

PRITCHARD: I'm so fucking angry rn. Well maybe. Thos might not take long. Now they are sayng they only need my help with something. Idk.

Fucking shit.

I'm so fucking horny rn. I don't have time for this shit

Det. Vineyard: Aw

Ok.

PRITCHARD: Gimme a sec and let me see what they need. I'll let u know.

Det. Vineyard: Let me know when your done

PRITCHARD: Ok babe. I'm so sorry

I'll let u know babe [Heart eye Emoji and wink Emoji blowing heart kiss

11. While Det. Vineyard was messaging with PRITCHARD above, GCSPD Det. Carpenter was conducting surveillance in the area of MV1's residence on the street where MV1 lived in Green Cove Springs. When Det. Vineyard received the message from PRITCHARD advising he was on MV1's street, Det. Carpenter observed a Clay County Sheriff's Office patrol vehicle arrive at the location PRITCHARD conveyed in the message above.

12. Shortly after Det. Vineyard received the message from PRITCHARD advising he had arrived, GCSPD Dispatch, as a diversion, contacted the Clay County

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Sheriff's Office and requested DUI enforcement assistance at the GCSPD police station. TRAVIS RYAN PRITCHARD arrived at GCSPD a short time later and was subsequently arrested by GCSPD officers.

13. GCSPD Det. Vineyard, in the presence of GCSPD Lt. Guzman, advised TRAVIS RYAN PRITCHARD of his *Miranda* rights, and he agreed to be interviewed. During this interview, PRITCHARD provided, in substance and among other things, the following information:

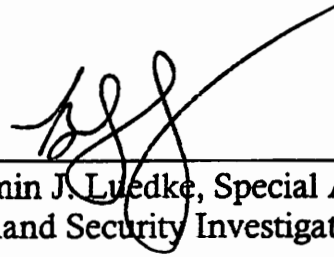
PRITCHARD acknowledged knowing MV1. PRITCHARD acknowledged being at MV1's house on a couple of occasions and acknowledged being in MV1's bedroom "late at night."

14. In addition, I learned from Det. Vineyard that TRAVIS RYAN PRITCHARD was wearing gray pattered boxer brief underwear with a blue waistband at the time of his arrest that appeared to match the underwear in the picture sent to Det. Vineyard in a message on May 1, 2020. Det. Vineyard provided me with a picture of PRITCHARD taken by Lt. Guzman after PRITCHARD's arrest on May 2, 2020, in which his underwear is made to be partially visible and it appears to match the underwear sent in the above message.

15. Based upon the foregoing facts, I have probable cause to believe that from in or about December 2019, through on or about May 2, 2020, in the Middle District

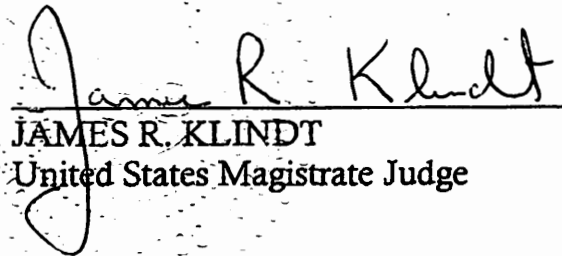
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of Florida, TRAVIS RYAN PRITCHARD, using a facility of interstate commerce, that is, by cellular telephone and via the internet, did knowingly persuade, induce, entice, and coerce and attempt to persuade, induce, entice, and coerce a person who had 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 18 U.S.C. § 2422(b).



Benjamin J. Luedke, Special Agent
Homeland Security Investigations

Subscribed and sworn to before me this 11th day of May, 2020,
at Jacksonville, Florida.



JAMES R. KLINDT
United States Magistrate Judge