AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

		Middle I	District of	Florida		
United States of America v.  GEORGE THOMAS GRIFFITHS, JR., a/k/a "ban_me_again"			) ) ) )	Case No. 3:21-mj	1066-MCR	
	Defenda	ni(s)				
		CRIMINA	AL CO	MPLAINT		
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.						
		February 3 - February 20			St. Johns and Duval	in the
Middle	District o	f Florida	, the def	fendant(s) violated:		
Code Section				Offense Descrip	ption	
18 U.S.C. § 2252(a)(2) Knowing distribution of child pornog						
This crin		aint is based on these facts	3:			
Continued on the attached sheet.						9
					Complainant's signature	
				Daniel	Moxley, Special Agent, FE Printed name and title	) i
Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim. P. 4.1 and 4(d).						
Date: $2/6$	9/21	Andrew State		-11/	Judge's signature	
City and state:	and the second s	Jacksonville, Florida		Monte C. R	ichardson, U.S. Magistrate Printed name and title	Judge

## **AFFIDAVIT**

- I, Daniel Moxley, being duly sworn, state as follows:
- I am a Special Agent with the Federal Bureau of Investigation (FBI) 1. and have been so employed since July 2017. I am currently assigned to the Jacksonville, Florida Division of the FBI, where I conduct investigations involving, among other criminal offenses, the sexual exploitation of children. Prior to becoming a Special Agent, I served as an Intelligence Analyst and Management and Program Analyst for the FBI for approximately 7 years. I hold Bachelor's Degrees in Economics and Political Science. I have also 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, and have assisted in the prosecution of cases involving these offenses. In the performance of my duties, I have investigated and assisted in the investigation of matters involving the solicitation, production, receipt, distribution, possession of, and access with intent to view images and videos depicting the sexual exploitation of children. I have also been involved in searches of residences relating to the solicitation, production, receipt, distribution, possession of, and access with intent to view child pornography during the execution of search warrants.

- 2. Specifically, 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, and 2422(b). 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 personal observations as well as from records and 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 that GEORGE THOMAS GRIFFITHS, JR. has committed a violation of 18 U.S.C. § 2252(a)(2), that is, knowing distribution of child pornography using the Internet.
- 4. I make this affidavit in support of a criminal complaint against GEORGE THOMAS GRIFFITHS, JR., a/k/a "ban\_me\_again", that is, during the period from on or about February 3, 2020 through on or about February 20, 2020, in the Middle District of Florida and elsewhere, GEORGE THOMAS GRIFFITHS, JR., a/k/a "ban\_me\_again", did knowingly distribute visual depictions using a

means and facility of interstate commerce, that is, by computer via the internet, when the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, in violation of 18 U.S.C. § 2252(a)(2).

- 5. On November 18, 2020, I reviewed an investigative lead from the FBI Milwaukee Division that had been sent to the FBI Jacksonville Division for further investigation. This investigative lead consisted of documents and other materials, and during my review of these materials I learned, among other things, the following:
- a. On January 16, 2020, Winnebago County Sheriff's Department Detective Michael Sewall, an FBI Task Force Officer assigned to the FBI Milwaukee Division, began a proactive undercover investigation using a particular social media application (the "app") in an effort to identify individuals attempting to sexually exploit children using the internet. Based on my training and experience, I know that this particular app is often used by individual users to meet online, engage in conversation through private messages, and share photographs and other content. I also know that the use of this app necessarily involves the use of the internet, which I know to be a facility of interstate commerce. Based on my training and experience, I also know that this particular social media application is often used by individuals

who have a sexual interest in minor children as a platform to identify other likeminded individuals to trade, distribute, and receive child pornography.

- b. While acting in an undercover capacity, Detective Sewall (the "UC") joined a public chat room on the app, the title of which appeared indicative of one that would attract users engaged in the trading of child pornography and sexual exploitation of children. While a member of this particular chat room group, the UC observed several users openly engaging in the distribution, exchange, and receipt of child pornography using this group over the internet.
- c. On February 3, 2020, the UC observed user "ban\_me\_again" upload two videos depicting child pornography to the chat room group using the app. The UC described the first of these two videos that he observed as depicting "an infant male with his penis exposed. An adult female is performing oral sex on the infant male." The UC described the second of these two videos that he observed as "a prepubescent female approximately 5 to 8 years old in pajamas. The prepubescent female exposes her vagina and rubs her vagina through her pajamas."
- d. On February 11, 2020, the UC observed user "ban\_me\_again" upload one video of child pornography to the same chat room group using the app. The UC described this video as "a nude prepubescent female lying on her stomach with her vagina and anus exposed. An adult's hand can be seen inserting yellow

beads connected by a string into the prepubescent female's anus one at a time. The adult then removes the beads from the prepubescent female's anus."

- e. On February 12, 2020, the UC observed user "ban\_me\_again" upload a video depicting child pornography to the same chat room group using the app. The UC observed and later described this particular video as "a prepubescent female approximately 8 to 12 years old wearing a blue sports bra undressing on her bed. The prepubescent female isn't wearing any bottoms and proceeds to turn around, bend over and expose her anus and vagina to the camera."
- f. Also on February 20, 2020, the UC observed user "ban\_me\_again" upload one video depicting child pornography to the same chat room group using the app. The UC described this video as "a prepubescent female approximately 6 to 9 years old wearing a purple shirt performing oral sex what on appears to be an adult male."
- g. On February 6, 2020, the FBI served an administrative subpoena on the company that owns the app seeking subscriber information for the app user "ban\_me\_again." On February 7, 2020, FBI Staff Operations Specialist Hannah Judd reviewed the documents responsive to this subpoena. The responsive documents listed the name of the user as "Happy Panda," the e-mail address as "hsolo420@gmail.com," and frequent IP logins as IP addresses 66.140.181.13 and

96.85.68.97 from January 8, 2020 to February 7, 2020. The account registration date for the account was listed as January 4, 2020.

- h. On February 11, 2020, an administrative subpoena was served by the FBI on AT&T requesting identifying information for the subscriber of the account that was assigned to IP address 66.140.181.13 on January 8, 2020 and February 7, 2020, which is the first date and last date that the app user "ban\_me\_again" was known to use that IP address, prior to the issuance of the subpoena to the company that owns the app. On February 14, 2020, AT&T provided responsive documents to this subpoena that listed the subscriber of the account that used IP address 66.140.181.13 on January 8, 2020 and February 7, 2020 as "George Griffiths," with a service address of 38 Sailfish Drive, Ponte Vedra, Florida 32082. The telephone numbers listed for this account were 904-710-8503 and 904-285-1213. The e-mail addresses listed for this account were "grifgt@aol.com" and "georgegriffith1213@att.net."
- i. On April 30, 2020, an administrative subpoena was served by the FBI on Comcast requesting identifying information for the subscriber of IP address 96.85.68.97 on January 9, 2020. On May 4, 2020, Comcast provided responsive documents to this subpoena listing the subscriber of the account that used IP address 96.85.68.97 on January 9, 2020 as "Medical Life, Inc.," with a service address of 11048 Baymeadows Road, Suite 9, Jacksonville, Florida 32256.

- j. Open source research of social media belonging to GRIFFITHS concluded that he was employed as an x-ray technologist at Crucial Care, located at 11048 Baymeadows Road, Suite 9, Jacksonville, Florida 32256.
- 6. On November 19, 2020, I reviewed the five videos depicting minors engaging in sexually explicit conduct that were captured and preserved by the UC and that were uploaded over the internet by user "ban\_me\_again" in the public chat room group on the app from February 3, 2020 to February 20, 2020, as set forth above. Based on my training and experience, I concluded that each video contained visual depictions of minors engaged in sexually explicit conduct. Since the child pornography videos uploaded by user "ban\_me\_again" were captured by the UC directly from the app, the titles of these files were altered (that is, renamed) to conform with the technical requirements of the UC's undercover computer device.
- 7. According to the UC, the video titled "IMG\_2309.MP4" was uploaded by user "ban\_me\_again" on February 3, 2020, at approximately 11:16 PM Central Standard Time. According to subpoena results from the company that owns the app, there is a corresponding BIND¹ event that occurs from IP address 66.140.181.13 on February 4, 2020, at approximately 5:16 AM Universal Time

<sup>&</sup>lt;sup>1</sup> Based on my training and experience, I know that a "BIND event" is generated if the user force-closes and opens the application, changes Wi-Fi or data locations, or when the user opens the application after it has been running in the background for longer than ten minutes.

Coordinated, which equates to February 3, 2020 at approximately 11:16 PM Central Standard Time. Based on my training and experience, I know that this means that this video was uploaded by user "ban\_me\_again" over the internet from IP address 66.140.181.13. Immediately prior to uploading the video titled "IMG\_2309", user "ban\_me\_again" uploaded a message to the private chat room that read "These lil girls are out of control." The video titled "IMG\_2309" is described as follows:

TITLE: "IMG 2309.MP4"

UPLOADED: February 3, 2020 at approximately 11:16 PM Central Standard Time from IP address 66.140.181.13.

MD5 HASH: 305a2e6e98be317276f00ab99eb246e7

DESCRIPTION: A color video with sound, approximately one minute and 54 seconds (1:54) in length, of a prepubescent female child, based on the child's complete absence of pubic hair and child-like facial features, wearing pajamas on a bed. At approximately 10 seconds into the video, the child begins to rub her vagina through her underwear and at approximately 17 seconds, fully exposes her vagina towards the camera, making it the focal point of the video frame. The child continually moves around on the bed in her pajamas and underwear rubbing her vagina throughout the majority of the video clip. At approximately one minute and 31 seconds (1:31), the child again fully exposes her vagina towards the camera, making it the focal point of the video frame. Based on my training and

experience, I have probable cause to believe that this video depicts at least one prepubescent minor engaged in sexually explicit conduct, that is, the lascivious exhibition of her genitalia, and therefore constitutes child pornography pursuant to Title 18, United States Code, Section 2256.

8. According to the UC, the video titled "IMG\_2616.MP4" was uploaded by user "ban\_me\_again" on February 11, 2020 at approximately 11:18 AM. The video titled "IMG\_2616.MP4" is described as follows:

TITLE: "IMG\_2616.MP4"

UPLOADED: February 11, 2020 at approximately 11:18 AM Central Standard Time from an unidentified IP address.

MD5 HASH: f31a54569ae9fd75ec17fefb9a1f897f

DESCRIPTION: This is a color video with sound and is approximately one minute and 57 seconds (1:57) in length. The video begins depicting a fully nude prepubescent female child, based on the child's complete absence of pubic hair, child-like facial features and child-sized arms and legs, lying on her stomach on a bed, fully exposing her vagina and anus, making these anatomical features the focal point of the video frame. A second, fully clothed minor female is shown sitting next to the fully nude prepubescent female appearing to read a magazine or book. Throughout the duration of the video, an adult male slowly inserts yellow beads connected with a string into the nude child's anus. The adult

male occasionally spreads a gel-type liquid on the child's anus. The adult male then slowly removes the yellow beads connected to the string from the child's anus, while the second minor female assists the adult male by spreading the child's buttocks. The nude child then re-positions herself onto her back and spreads her legs, fully exposing her genitalia and making it the focal point of the video frame. Based on my training and experience, I have probable cause to believe that this video depicts at least one prepubescent minor engaged in sexually explicit conduct, that is, the lascivious exhibition of her anus and genitalia, and therefore constitutes child pornography pursuant to Title 18, United States Code, Section 2256.

9. According to the UC, the video titled "IMG\_2235.MP4" was captured on February 3, 2020, at approximately 3:44 AM Central Standard Time; however, it is unknown at which time user "ban\_me\_again" uploaded the video to the public chat room. According to subpoena results from the company that owns the app, BIND events user IP address 66.140.181.13 were generated for user "ban\_me\_again" that occur from February 4, 2020, at approximately 12:51 AM Universal Time Coordinated to February 4, 2020, at approximately 3:07 PM Universal Time Coordinated, which equates to February 3, 2020 at approximately 6:51 PM Central Standard Time to February 4, 2020 at approximately 9:07 AM Central Standard Time. Immediately prior to uploading the video titled "IMG\_2235.MP4", user "ban\_me\_again" uploaded a message to the private chat

room that read "I love mom/kid stuff." Immediately following uploading the video titled "IMG\_2235.MP4", user "ban\_me\_again" uploaded a message to the private chat room that read "One of my favorite vids." The video titled "IMG\_2235.MP4" is described as follows:

TITLE: "IMG\_2235.MP4"

CAPTURED by UC: February 3, 2020 at approximately 3:44

AM Central Standard Time.

MD5 HASH: b6446fce0a32a0bea532efc6bea708bd

DESCRIPTION: This is a color video with sound, and is approximately 15 seconds (0:15) in length. This video depicts an infant or young toddler male child, based on the size of the child's genitalia and lack of pubic hair, who is not wearing any pants, fully exposing his penis. What appears to be a female of indeterminate age is seen performing oral sex on the minor child's penis throughout the duration of the video. The camera is zoomed in on the minor child's exposed penis and the female, making it the focal point of the video frame. Based on my training and experience, I have probable cause to believe that this video depicts at least one prepubescent minor engaged in sexually explicit conduct, that is, oral-genital sexual intercourse and the lascivious exhibition of his genitalia,

and therefore constitutes child pornography pursuant to Title 18, United States Code, Section 2256.

- 10. On November 19, 2020, I was informed by St. Johns County Sheriff's Office (SJSO) Detective Cheyenne Kroul that a Florida state search warrant was executed at the residence located at 38 Sailfish Drive, Ponte Vedra, Florida 32082 earlier that morning based on a child exploitation investigation. I am familiar with Detective Kroul and I know that she is experienced in, among other things, the investigation of child exploitation cases.
- 11. On November 19, 2020 and November 20, 2020, I spoke with Detective Kroul several times and she provided me with several documents and reports, including the search warrant for the residence located at 38 Sailfish Drive, Ponte Vedra, Florida 32082. By speaking with Detective Kroul and reviewing the documents and reports that she provided, I learned the following:
- a. On October 23, 2020, Detective Kroul received CyberTip report 64733571 (CT #64733571) from the National Center for Missing and Exploited Children (NCMEC) that concluded the user "ban\_me\_again" on the same app referred to above had uploaded 13 files of possible child sexual abuse material on February 19, 2020. Based on my training and experience, I know that NCMEC regularly receives CyberTips from individuals and business entities regarding the possible sexual exploitation of children. These CyberTips often include profile

information for users of online services and apps who are believed to be sharing, uploading or discussing child pornography based on shared images, profile information, and text conversations. I am also aware that NCMEC sends the materials contained in these CyberTips to the geographically appropriate law enforcement agencies for investigation.

- b. Detective Kroul viewed all 13 files attached to CT #64733571, including a file titled "6611a799-a522-4445-95ac-f524b5acfd1c.mp4" with MD5 hash "b6446fce0a32a0bea532efc6bea708bd." Detective Kroul described this video file as "a color video 14 seconds in length depicting an adult performing oral sex on an infant male's penis. The adult appears to be a female but due to only seeing the mouth, the gender could not be determined."
- c. The app, which submitted information to NCMEC that resulted in the generation of CT #64733571, provided IP address information for user "ban\_me\_again" and listed the user's IP address as 66.140.181.13 on February 12, 2020.
- d. Detective Kroul received subpoena results from AT&T for IP address 66.140.181.13 used on February 12, 2020, which listed the subscriber as

<sup>&</sup>lt;sup>2</sup> This MD5 hash value is the same as the MD5 hash value of the video file titled "IMG\_2235.mp4" referenced above.

"George Griffiths," with a service address of "38 Sailfish Drive, Ponte Vedra Beach, Florida 32082."

- e. The app provided IP address information for user "ban\_me\_again" in CT #64733571 which listed this user's IP address as 96.85.68.97 during the period from February 13, 2020 to February 17, 2020, which was used to upload 10 of the 13 videos referenced above.
- f. Detective Kroul received subpoena results from Comcast for IP address 96.85.68.97 used from February 13, 2020 to February 17, 2020, which listed the subscriber as "Medical Life Inc.," with a service address of "11048 Baymeadows Road, Suite 9, Jacksonville, Florida 32256."
- g. On November 10, 2020, Detective Kroul traveled to the medical business located at 11048 Baymeadows Road, Suite 9, Jacksonville, Florida 32256 and determined GRIFFITHS was an "X-Ray/CT Technician" at Crucial Care located at this address.
- 12. On November 22, 2020, I reviewed an audio recording of the consensual interview of GRIFFITHS conducted by Detective Kroul, SJSO Detective Mohammad Toubaili, and U.S. Homeland Security Investigations Special Agent Ashley Wilson. Detective Kroul advised me that this interview took place on November 19, 2020 in conjunction with the execution of a search warrant for the residence of GEORGE THOMAS GRIFFITHS, JR. located at 38 Sailfish Drive,

Ponte Vedra Beach, Florida 32082. I was also advised that during the execution of this search warrant, an Apple iPhone 11 Pro device belonging to GRIFFITHS was seized pursuant to the search warrant.

- 13. At the beginning of this interview, GRIFFITHS stated his name and his date of birth, and he acknowledged being present when Detective Kroul read him the search warrant but denied hearing her as she read GRIFFITHS his constitutional rights. Detective Kroul then re-advised GRIFFITHS of his constitutional rights, and GRIFFITHS confirmed that he understood those rights. During this interview, GRIFFITHS stated, in summary and among other things, the following:
- a. GRIFFITHS has access to social media including Facebook, Instagram, and Snapchat, and that his user name for each of these three accounts is "George Griffiths." He said that he may also have Whatsapp. He acknowledged that he had an email account through AOL.com and an email account through his work. GRIFFITHS advised that he had worked as a radiology technician for the last seven years. He has been living in this current residence since January 2020, and lived in a residence in Jacksonville before that.

the app (referenced above) that he had not used in a long time. He stated that it was a name that he made up. GRIFFITHS stated that he used this app to talk to people and that it was "possible" that he exchanged pictures and videos on the app. When asked what these pictures and videos depicted, GRIFFITHs replied "there was pornography exchanged." When asked for specifics about what this content was, he advised "probably some bestiality." He said that these bestiality materials possibly involved both adults and children. GRIFFITHS has looked at adult pornography on his phone, including material from "Pornhub."

c. GRIFFITHS advised that "there shouldn't be" child pornography on his phone. He mainly used his phone on the app. GRIFFITHS acknowledged that he "probably" exchanged some of these videos while he was at Crucial Care [at work]. He denied having a sexual interest in children. When asked if he just liked watching child pornography, GRIFFITHS responded, "depending," but stated that he did not have "any desire in doing it [himself]." He said that people send you stuff and then you send it to somebody else..." When asked when he received a video of child pornography from somebody if he would send that video out to other people, GRIFFITHS stated, "um, if there was somebody else that wanted it, probably." GRIFFITHS stated he "may have" and "it's possible" that he used the app to ask for child pornography. He usually received videos through the app in a group chat setting. When asked how many times he

sent child pornography, GRIFFITHS first responded, "I don't know" and then clarified, "more than one or two."

- d. GRIFFITH acknowledged that he had his cell phone and an iPad in his residence. He stated that his cell phone was the "only thing that was used." He was asked when was the last time that he looked at child pornography, and he responded, "I don't know." Shortly thereafter, GRIFFITHS in substance requested a lawyer and the interview was terminated.
- 14. On December 23, 2020, I received a portable USB drive containing a forensic image (copy) of GRIFFITHS's Apple iPhone 11 Pro from St. Johns County Sheriff's Office Digital Forensics Detective Dave Causey. I transported the portable USB drive directly to the FBI Jacksonville Field Office, located at 6061 Gate Parkway, Jacksonville, Florida 32256, and checked it into the evidence control room.
- 15. During the period from January 8, 2021 through January 13, 2021, I reviewed the forensic image of GRIFFITHS' Apple iPhone 11 Pro cell phone and observed that it contained at least 2,000 images and at least 10 videos depicting minors engaged in sexually explicit conduct. Many of these images and videos involved infants, toddlers, and prepubescent children engaged in sexually explicit

conduct. I also observed that GRIFFITHS's iPhone had access to a Telegram<sup>3</sup> account with username "Happy Panda" that was registered with GRIFFITH's known telephone number. The iPhone device contained several Telegram direct message conversations between user "Happy Panda" and other Telegram users where the exchange of images, videos and Mega<sup>4</sup> links occurred or were discussed. Several of these Telegram direct message conversations contained files and/or Mega links that were unrecoverable; however, two of the conversations involved the exchange of child pornography that was recovered by forensic tools are set forth below.

16. I have reviewed a Telegram direct message conversation that involved the exchange of child pornography between Telegram user "Happy Panda" and Telegram user "Alex" that occurred from November 3, 2020 to November 20, 2020 and was recovered from GRIFFITHS's Apple iPhone 11 Pro cell phone. I have also reviewed the video files described below. This conversation is set forth as follows:

Happy Panda: [sent a color video approximately one minute and 59 seconds in length, of a prepubescent female, based on the child's complete absence of pubic hair and genitalia size, lying fully nude on her back with her legs suspended in the air. An adult male is penetrating the

<sup>&</sup>lt;sup>3</sup> Based on my training experience, I know that Telegram is a cloud-based instant messaging, video messaging, and file sharing social media application, which allow users to exchange images and videos with other users using the internet.

<sup>&</sup>lt;sup>4</sup> Mega Inc. is a New Zealand-based cloud storage and file hosting/sharing service for mobile and desktop applications. Mega links provide users direct access to the storage location of a particular file.

child's vagina with his penis and the camera zooms in, making it the focal point of the video clip. At approximately 20 seconds into the video, the male inserts his penis into the child anus and performs anal sex on the child while inserting his fingers into the child's vagina. At approximately one minute and 18 seconds, the adult male re-inserts his penis into the child's vagina and continually penetrates the child's vagina until he ejaculates on the child's stomach at approximately one minute and 37 seconds]

Alex:

[sent two files that could not be recovered]

Alex:

Send

Happy Panda: [sent 22 files that could not be recovered]

Alex:

[sent 20 files that could not be recovered]

Alex:

Send

Alex:

?

Happy Panda: [sent 10 files that could not be recovered]

Alex:

[sent 15 files that could not be recovered]

Alex:

Send

Happy Panda: [sent 10 files that could not be recovered]

Alex:

[sent 18 files that could not be recovered]

Alex:

Send

Happy Panda: [sent Mega link]

Alex:

[sent 36 files, seven of which were recovered, all seven of the recovered video files depict at least one prepubescent female child

engaged in sexually explicit conduct

Happy Panda: [sent Mega link]

17. I have also reviewed a Telegram direct message conversation that involved the exchange of child pornography between Telegram user "Happy Panda" and Telegram user "Jasur SD" that occurred on November 18, 2020 and was recovered from GRIFFITHS's Apple iPhone 11 Pro cell phone. I have also reviewed the video files described below. This conversation is set forth as follows:

Jasur SD:

hello

Jasur SD:

trade CP?

Happy Panda:

Yes!! Send.

Jasur SD:

[sent two files, one of which could not be recovered. The recovered file is a color video with sound, approximately 42 seconds in length, of a prepubescent female, based on the child's complete absence of pubic hair, lack of breast development, and child-like facial features, standing in front of a camera. The video begins with the child removing her shirt and getting completely nude fully exposing her vagina and breasts.

Approximately 20 seconds into the video, the child turns around and bends over, fully exposing her anus and vagina, making it the focal point of the video clip. The child remains standing fully nude in front of the camera until the video concludes.]

Jasur SD:

so?

Happy Panda:

[sent 22 files that could not be recovered]

Jasur SD:

[sent 8 files that could not be recovered]

17. On February 5, 2021, I reviewed CT #64733571, which provided IP address information for user "ban\_me\_again", and observed that user "ban\_me\_again" uploaded a video with MD5 hash value

"b6446fce0a32a0bea532efc6bea708bd", which is the same MD5 hash as the video described above titled "IMG\_2235.MP4", from IP address 66.140.181.13 on or about February 12, 2020.

18. Based upon the foregoing facts, I have probable cause to believe that during the period from on or about February 3, 2020 through on or about February 20, 2020, in the Middle District of Florida, GEORGE THOMAS GRIFFITHS, JR., a/k/a "ban\_me\_again," did knowingly distribute visual depictions using a means and facility of interstate commerce, that is, by computer via the internet, when the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, in violation of 18 U.S.C. § 2252(a)(2).

DANIEL R. MOXLEY, Special Agent Federal Bureau of Investigation

Subscribed and sworn to before me this \_ Jacksonville, Florida.

\_ day of February, 2021, at

MONTE C. RICHARDSON
United States Magistrate Judge