

UNITED STATES DISTRICT COURT

for the
District of Minnesota

UNITED STATES OF AMERICA,

**FILED UNDER SEAL PURSUANT TO 18 U.S.C.
§ 3509(d)(2) AND LOCAL RULE 49.1(c)(1)(G)**

v.

Case No. 23-MJ-562 (DJF)

CALEB VINCENT MCLAUGHLIN,

a/k/a "JAKE BENSON,"

a/k/a "LIFT11,"

a/k/a "TECH4CM"

CRIMINAL COMPLAINT

I, Matthew Vogel, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT 1 – Production and Attempted Production of Child Pornography

On or about July 31, 2021, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to, and did employ, use, persuade, induce, entice, and coerce Minor Victim 1, approximately 14 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a data file identified as b~EiQSFVhaUndpcjc2aW5HZjRGWGgzczjZOTHoAGgAyAQNIA1AEYAE~v4.mp4, a video approximately nine seconds in duration depicting a closely framed view of Minor Victim 1 masturbating and inserting fingers into her vagina, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT 2 – Child Enticement and Attempted Child Enticement
Using a Facility of Interstate Commerce**

From at least on or about June 9, 2022, and continuing through at least on or about December 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN using a facility and means of interstate and foreign commerce, namely, the Internet, did knowingly attempt to and did persuade, induce, entice, and coerce Minor Victim 2, approximately 14 to 15 years old, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, to wit, Criminal Sexual Conduct in the first, second, and third degrees in violation of Minnesota Statute Sections 609.342.1a(f), 609.342.2(b), 609.343.1a(f), 609.343.2, 609.344.1a(b), and 609.344.2, that occurred in and around Ramsey County, Minnesota, and the production of child pornography in violation of Title 18, United States Code, Section 2251(a), all in violation of Title 18 United States Code, Sections 2422(b) and 2427.

COUNT 3 – Receipt and Attempted Receipt of Child Pornography

On or about June 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to and did knowingly receive a visual depiction, to wit, a data file identified as b~EioSFU83SVFLTEoxeHNVHVRnY0twU2dwdRoAGgAiBgj0_suWBjIBA1AEYAE~v4.jpg, an image depicting Minor Victim 2, approximately 14 years old, using her fingers to spread the labia and display the vaginal opening. The visual depiction was received using any means or facility of interstate commerce, including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT 4 – Distribution of Child Pornography

On or about November 23, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN did knowingly distribute a visual depiction, to wit, a data file identified as b~EiQSFxhvZIVtYXB3TTUwbFpSQ29xY2lQWRoAGgAyAX11A1AEYAE~v4.mp4, a video file approximately 39 seconds in duration, depicting MCLAUGHLIN engaged in vaginal intercourse with Minor Victim 3, approximately 15 years old. The visual depiction was distributed using any means or facility of interstate commerce, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

See attached Affidavit, incorporated here

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



Complainant's Signature

SUBSCRIBED and SWORN before me by
reliable electronic means (Zoom and email)
pursuant to Fed. R. Crim. P. 41(d)(3)

Date: July 17, 2023

Matthew Vogel, Special Agent
Federal Bureau of Investigation

Printed Name and Title



Judge's Signature

City and State: Minneapolis, MN

The Honorable Dulce J. Foster
United States Magistrate Judge

Printed Name and Title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

CALEB VINCENT MCLAUGHLIN

a/k/a "JAKE BENSON,"

a/k/a "LIFT11,"

a/k/a "TECH4CM"

Case No. 23-MJ-562 (DJF)

**FILED UNDER SEAL PURSUANT TO
18 U.S.C. § 3509(d)(2) AND LOCAL
RULE 49.1(c)(1)(G)****AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Matthew Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to the Minneapolis Division and the Minnesota Child Exploitation Task Force, where my investigative responsibilities include investigation of child sexual abuse and exploitation crimes such as production, possession, receipt, and distribution of child pornography. I have gained knowledge and experience through training at the FBI Academy, in service training, and everyday work in conducting these types of investigations. I have received training in the area of child pornography and child exploitation investigations and have reviewed numerous examples of child pornography as defined at 18 U.S.C. § 2256, in various forms of media, including computer media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by 18 U.S.C. §§ 3052 and 3107 to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

PURPOSE OF AFFIDAVIT

3. I make this affidavit in support of an application for a Criminal Complaint charging CALEB VINCENT MCLAUGHLIN (DOB XX/XX/1997¹), a/k/a JAKE BENSON, a/k/a LIFT11, a/k/a TECH4CM, with Production of Child Pornography, and attempt in violation of 18 U.S.C. §§ 2251(a) and (e); Receipt and Distribution of Child Pornography, and attempt in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1); and Child Enticement Using a Facility of Interstate Commerce in violation of 18 U.S.C. §§ 2422(b) and 2427; as follows:

COUNT 1 – Production and Attempted Production of Child Pornography: On or about July 31, 2021, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to, and did employ, use, persuade, induce, entice, and coerce Minor Victim 1, approximately 14 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit, a data file identified as b~EiQSFVhaUndpcjc2aW5HZjRGWGgzcjZOTHoAGgAyAQNIA1AEYAE~v4.mp4, a video approximately nine seconds in duration depicting a closely framed view of Minor Victim 1 masturbating and inserting fingers into her

¹ Per local rules and 18 U.S.C. § 3509, I have partially redacted personally identifying information, such as dates of birth, from this affidavit. Unless otherwise noted, this information is known to me and available to the Court.

vagina, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT 2 – Child Enticement and Attempted Child Enticement Using a Facility of Interstate Commerce: From at least on or about June 9, 2022, and continuing through at least on or about December 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN using a facility and means of interstate and foreign commerce, namely, the Internet, did knowingly attempt to and did persuade, induce, entice, and coerce Minor Victim 2, approximately 14 to 15 years old, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, to wit, Criminal Sexual Conduct in the first, second, and third degrees in violation of Minnesota Statute Sections 609.342.1a(f), 609.342.2(b), 609.343.1a(f), 609.343.2, 609.344.1a(b), and 609.344.2, that occurred in and around Ramsey County, Minnesota, and the production of child pornography in violation of Title 18, United States Code, Section 2251(a), all in violation of 18 U.S.C. §§ 2422(b) and 2427.

COUNT 3 – Receipt and Attempted Receipt of Child Pornography: On or about June 15, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN attempted to and did knowingly receive a visual depiction, to wit,

a data file identified as b~EioSFU83SVFLTEoxeHNVTRnY0twU2dwdRoAGgAiBgj0_suWBjIBA1AEYAE~v4.jpg, an image depicting Minor Victim 2, approximately 14 years old, using her fingers to spread the labia and display the vaginal opening. The visual depiction was received using any means or facility of interstate commerce, including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 4 - Distribution of Child Pornography: On or about November 23, 2022, in the District of Minnesota and elsewhere, CALEB VINCENT MCLAUGHLIN did knowingly distribute a visual depiction, to wit, a data file identified as b~EiQSFXhvZIVtYXB3TTUwbFpSQ29xY2lQWRoAGgAyAX1IA1AEYAE~v4.mp4, a video file approximately 39 seconds in duration, depicting MCLAUGHLIN engaged in vaginal intercourse with Minor Victim 3, approximately 15 years old. The visual depiction was distributed using any means or facility of interstate commerce, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

4. The facts set forth in this affidavit come from my personal observations, my training and experience, evidence gathered pursuant to administrative subpoenas, search warrants, searches pursuant to consent, information provided by victims and witnesses, and information obtained from other law enforcement officers. Because this affidavit is

submitted for the limited purpose of establishing probable cause to support the contemporaneously filed criminal complaint, it does not include each and every fact known to me or to other investigators. Unless otherwise noted, oral or written statements documented are related in substance and in part.

PROBABLE CAUSE²

5. This investigation began with a disclosure from Minor Victim 4³ about one or more persons using online services to produce and distribute sexually explicit images of MV 4 via the Internet. MV 4 is an identified minor from Minnesota. MV 4 was 14 years old at the time she made the disclosure, and was approximately 11 or 12 at the time of the offenses under investigation began.

Disclosures by Minor Victim 4 and Consent Search

6. On March 22, 2023, MV 4's father contacted the FBI to report that MV 4 had recently come to him to report that she has been sexually exploited online since she was approximately 11. The following day, I visited MV 4's home and met with her parents. The parents voluntarily provided MV 4's Apple iPhone and signed a consent to search

² Because the communications described herein occurred between parties in different locations in the United States and the records discussed use timestamps in Universal Time Coordinated (UTC), dates shown below are "on or about" dates. For example, if a victim sent a message from Minnesota at 12:30 A.M. on January 1, 2022, local time, it would still be December 31, 2021, for a suspect receiving the message in the Pacific Time Zone.

³ Unless otherwise noted, anonymized names are known to me and available to the Court upon request.

form. I examined the device and found several digital artifacts, images, and screenshots relevant to the information discussed below.

7. On April 5, 2023, MV 4 presented for a forensic interview. The interview was audio and video recorded. In addition, I was present during the interview electronically monitoring it live from another room. In summary, MV 4 disclosed that beginning in or around the summer after 7th grade—or approximately summer 2021—she was contacted by Snapchat ID lift11. Lift11 offered to pay MV 4 for “nudes.” MV 4 discussed money with lift11, and lift11 eventually sent her a \$10 online gift card to prove he would pay. They also discussed age. MV 4 recalled that she may have lied and said she was 13. In any case, lift11 would have known MV 4 was a minor. MV 4 used her own name and recalled that lift11 gave his name as “Caleb” or “Jake.”

8. Lift11 wanted “nudes” from MV 4. He also wanted to meet her for sex. At first, MV 4 sent “nudes” she already had stored on her phone or in her Snapchat account. Lift11 then asked her for more nude images and told MV 4 she had to take pictures and videos of “what he wanted.” Lift11 paid MV 4 a few times by sending emails with online gift cards of approximately \$25-50 to her. MV 4 saw that the emails had different names on them. He also sent a few gift cards in larger amounts—maybe \$100—by photographing physical gift cards and showing her the redemption codes. In total, MV 4 estimated lift11 sent her approximately \$200-300.

9. At the direction of lift11, MV 4 sent approximately 30 images and a couple of explicit videos. MV 4 recalled that lift11 sent her images of an adult Caucasian male,

purportedly himself. I found screenshots of the adult male on MV 4's iPhone and compared the person depicted to MCLAUGHLIN's Minnesota driver license—

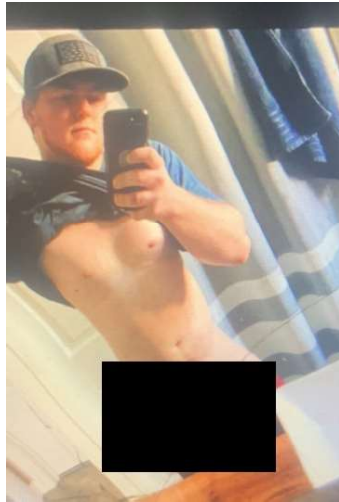


Photo Stored on MV 4's iPhone



DVS Photo for CALEB MCLAUGHLIN

The images of lift11 MV 4 received also included images depicting an adult male exposing his erect penis. Lift11 also sent non-explicit images to MV 4 as he discussed meeting her for sex. MV 4 commented that she did not drive. Lift11 then sent MV 4 a picture of his car which MV 4 understood to communicate that lift11 would pick her up. For example, lift11 sent a photo of two vehicles, a black Ford Mustang with no front license plate and a Jeep bearing Minnesota license plate [REDACTED]—



Photo Stored on MV 4's iPhone

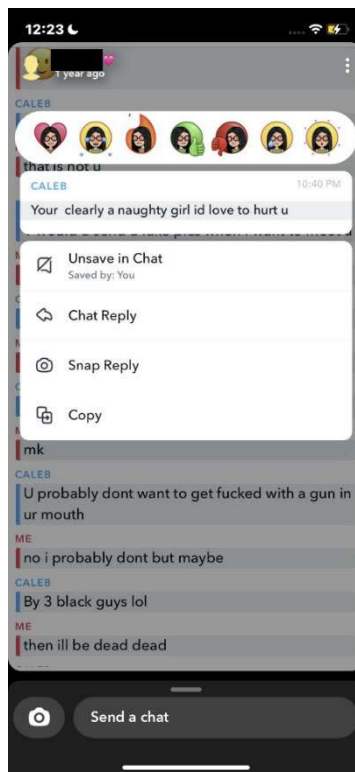
Records from the Minnesota Department of Public Safety, Driver and Vehicle Services (DVS) reflect that the registered owner of the 2016 Jeep Wrangler (depicted on the right) was MCLAUGHLIN from its initial purchase through approximately April 2020. There was no information available from the photo found on MV 4's iPhone to identify when the above image was taken. Lift11 also made other statements about meeting for sex, including that he would pick MV 4 up, pay her, and that he wanted MV 4 to give him "head⁴." MV 4 stated that lift11's proposed meet up did not occur. The black Ford Mustang depicted to the left of the Jeep appears to be the same vehicle sent to other victims in photographs described below. It is not known to be registered to MCLAUGHLIN in Minnesota.

10. At some point in their conversation, lift11 sent MV 4 one or more messages about his wife or girlfriend. MV 4 did not recall this information in detail, but took a screenshot of a message wherein lift11 directed MV 4 not to contact the woman, saying, "plz dont message her."

11. MV 4 disclosed that lift11 directed MV 4 to record a video depicting her "fucking herself." MV 4 explained that lift11 told her to insert fingers into her vagina. He sent her an example video depicting a girl masturbating. MV 4 believed the girl in the video was just a little older than herself—approximately 15 or 16 years old. MV 4 did as directed using her iPhone, and sent the video to lift11 on Snapchat. After she sent the video, lift11 did not pay as promised and at some point lift11 blocked MV 4.

⁴ I am aware this is a slang term used in this context to mean oral sex.

12. After lift11 failed to pay MV 4, she was upset. She found what she believed to be another Snapchat account belonging to lift11. MV 4 did not recall the account ID, but recalled that the profile picture, or “bitmoji,” was the same on both accounts. The display name for this other account was “Caleb.” The conversation between the two continued on the second account. MV 4 took a screenshot of a text conversation with Caleb—



Screenshot of Snapchat Messages Stored on MV 4's iPhone

13. MV 4 did not recall the context of the above chat, but recalled that Caleb/lift11 spoke violently to her at times, including the above messages: “Your clearly a naughty girl id love to hurt u,” and “U probably dont want to get fucked with a gun in ur

mouth by 3 black guys lol.”⁵ I noted that the screenshot states it was taken of a conversation that occurred “1 year ago.” There was no additional information to provide context on when the actual conversation occurred.

14. MV 4 did not recall details about what information Caleb provided her about his family, but at the time of these communications, MV 4 was able to find social media posts by Caleb’s wife and/or girlfriend. MV 4 saved this information on her phone. I located some of the stored information, including the picture below and noted that the photo appears on a social media page in the name of an adult female living at the same address shown on MCLAUGHLIN’s driver license record—



Photo Stored on MV 4’s iPhone

15. After all communication between MV 4 and Caleb/lift11 ceased, MV 4 heard nothing more for several months. At some point after not hearing from him, MV 4 began receiving messages from online accounts which she believed were Caleb/lift11. At the time

⁵ Where written online communications are quoted herein, I have documented them as written, including typographical errors, slang, and abbreviations. Where quoted communications are edited for clarity or brevity, edits are denoted in brackets.

MV 4 disclosed to her parents what had been happening to her, MV 4 was actively receiving messages on Instagram threatening to publish naked pictures of MV 4 if she did not produce more. These accounts sent MV 4 nude pictures of herself that she had taken, including pictures MV 4 believed she sent to lift11. MV 4 stored screenshots of some of the messages she received from these accounts.⁶ Based on my review of these screenshots and records I have reviewed from Snap, Inc. and Meta Platforms—owner of Instagram—I do not believe these additional contacts are in fact from MCLAUGHLIN. Based on currently available information and my training and experience, it appears likely that images MV 4 sent to lift11 were likely distributed or otherwise published alongside MV 4’s contact information and that other offenders have more recently been contacting MV 4 with extortionate demands for new sexually explicit images.

Administrative Subpoena Results

16. In response to an administrative subpoena, Snap, Inc. provided subscriber and registration records and IP logs for Snapchat ID lift11. Those records reflect the following information:

⁶ I have performed initial investigation into at least three of the accounts found in messages stored on MV 4’s iPhone. I am aware from this initial investigation that none of the currently known messages or accounts are from CALEB MCLAUGHLIN. Instead, some of the accounts are controlled by unidentified users overseas and some by an identified adult male in New Mexico. Investigation into the users of these accounts is ongoing. Based on this information, I believe it is likely that sexually explicit images of MV 4 were posted somewhere online along with contact information for MV 4 by one or more persons unknown. Such posts are sometimes referred to as “revenge porn,” as they often seek to cause emotional harm, embarrassment, and fear to victims by having sexually explicit images in circulation alongside sufficient information to allow strangers on the Internet to contact a victim and re-victimize that person.

- a. Account Created: June 30, 2016
- b. Display Name(s): caleb
- c. Registration Account: [REDACTED]@gmail.com (unverified⁷), telephone number XXX-XXX-7937 (verified)
- d. IP logs: Logs show attempted access to the account using on CenturyLink IPs 75.168.221.185, 65.128.173.247, and 75.168.207.102. Snapchat logs reflect numerous unsuccessful login attempts since May 2022. The last successful login was May 14, 2022, from IP 65.128.173.247.

17. In response to an administrative subpoena, Lumen Technologies, the parent company for CenturyLink Internet services, provided records about the above-mentioned IP addresses. At the relevant dates and times, all three IP addresses were assigned to MCLAUGHLIN at his Pine City home address with email address [REDACTED]@gmail.com.

18. In response to an administrative subpoena, Google LLC provided records associated with [REDACTED]@gmail.com. Google records reflect the following subscriber and registration information:

- a. Name: Caleb McLaughlin

⁷ Snapchat may allow users to enter any data matching the format of an email address, (*i.e.*, abc@xyz.com). Snapchat will then send an email to the email address entered by the user asking the user to verify s/he has access to the email address. The account may be able to remain active whether or not the user successfully verifies the email address. The fact that a registered email address shows as unverified means the user did not complete the verification process. A verified email address means the user successfully retrieved an authentication code from the email account and likely has access to that account. Google LLC records reflect no such email address exists.

- b. Google Pay Information: Caleb McLaughlin, telephone number XXX-XXX-7397⁸

Search of Snapchat IDs lift11 and tech4cm

19. On April 20, 2023, I applied for and was granted a search warrant for content associated with Snapchat ID lift11 in District of Minnesota case number 23-MJ-335 (DTS). In response to the search warrant, Snap, Inc. provided records for the account including over 110,000 lines of chat messages dated January 1, 2019⁹ through April 16, 2023. The last message sent by lift11 was dated July 30, 2022. The lift11 account records contained stored chats with over 2,600 other account IDs.

20. The vast majority of conversations stored in the account are focused on sex, sexually explicit images, and related topics. While some of MCLAUGHLIN's chat partners are apparent adults, the conversations reflect MCLAUGHLIN had a significant sexual interest in girls aged 11-17. The account contained many thousands of sexually explicit images and videos, including several thousand images of a few males posing naked with erect penises visible, and many visually similar copies of apparent adult pornography. From the context of chats wherein these pornographic images were sent, MCLAUGHLIN appears to purport to be the male depicted. Some images are visually consistent with

⁸ This is the same phone number used to register Snapchat ID lift11. After July 30, 2022, MCLAUGHLIN appears likely to have acquired a new phone number, XXX-XXX-9334.

⁹ This is the earliest date covered within the scope of the search warrant. From the context of early conversations, it is apparent the account was actively engaged in sexually exploitative conversations with minors prior to this date.

MCLAUGHLIN's appearance; however, a very large number of the images depict unknown males.¹⁰

21. lift11 sent out a number of images visually consistent with MCLAUGHLIN's appearance. For example—



Sent by lift11 January 5, 2019



Sent by lift11 April 30, 2020

22. In my investigation, I determined that MCLAUGHLIN likely used another Snapchat ID, tech4cm. Similarly, I applied for and was granted a search warrant for content associated with Snapchat ID tech4cm in District of Minnesota case number 23-MJ-517 (ECW). In response to the search warrant, Snap, Inc. provided records for Snapchat ID tech4cm. Based on my review, this account also contained a large number of photos and videos depicting MCLAUGHLIN, his vehicles, and information regarding his use of online accounts and telephone number XXX-XXX-9334 relevant to this investigation.

¹⁰ Many of these photos depict a single likely adult male who previously made sexually explicit images commercially available on the Internet. While this person's online persona is known, his real identity is not, nor is the depicted man suspected of any wrongdoing related to this investigation.

Search of [REDACTED]@gmail.com and Information Regarding MCLAUGHLIN's Use of Electronic Devices to Engage in the Offenses

23. In response to a search warrant obtained under District of Minnesota case number 23-MJ-336 (DTS), Google LLC provided records, including contents of communications, stored in MCLAUGHLIN's [REDACTED]@gmail.com account. Responsive records included emails dated August 5, 2022, from [REDACTED]@gmail.com to Snapchat support requesting assistance in accessing Snapchat ID lift11 as the user, "had my phone stolen and can no longer verify my phone number or email." Based on these emails, it appears likely that MCLAUGHLIN lost access to Snapchat ID lift11 in or around early August, 2022. This is consistent with Snapchat records which show the last successful access to lift11 around that time.

24. Criminal history records show that on July 31, 2022, MCLAUGHLIN was arrested on suspicion of driving under the influence in Pine County, Minnesota. Given the timing of MCLAUGHLIN's arrest and the loss of his cell phone, it may be that the phone was last in MCLAUGHLIN's possession around the time of his DUI arrest and that he acquired a new phone after being released from jail.

25. Shortly after his release from jail, Snap, Inc. records reflect the creation of Snapchat ID tech4cm. That account was registered with telephone number XXX-XXX-9334. According to records obtained from Tracfone—the service provider for this telephone number—the account is associated with CALEB MCLAUGHLIN. At least one bill was paid with a credit card associated with his residence in Pine City, Minnesota. The phone number is associated with an Apple iPhone SE, IMEI 356552965917636.

Minor Victim Identification

26. After reviewing search warrant returns with chats, stored images, and videos depicting the sexual exploitation of minors, from January 2019 to June 2023, the FBI identified minor victims and arranged Child/Adolescent Forensic Interviews to obtain victim statements. These forensic interviews were audio and video recorded. The information below includes information from chats and information disclosed by minor victims.

Minor Victim 5

27. Beginning on November 9, 2019, lift11 communicated with a Snapchat ID associated with Minor Victim 5, a self-identified 14-year-old girl.¹¹ MCLAUGHLIN purported to be 17 and named “Jake.” The conversation developed into a game of “Truth or Dare” in which MCLAUGHLIN issued “dares” to “send me a picture with your shirt off.” In the following days, based on the context of the text messages, the two apparently engaged in live video chats. For example, MV 5 wrote, “Do you really want to video chat?” MCLAUGHLIN replied, “if we’re naked.” MCLAUGHLIN went on to discuss sexual contact with animals, including, “I no a girl who lets her dog fuck her [...] its pretty cool [...] I think its a good idea. She said it feels really good [...] Would u d[o] that?”

28. The conversation continued into January 2020. During the chat, MCLAUGHLIN solicited MV 5 for sex at least twice. By July 20, 2020, the chat indicates

¹¹ Minor Victim 5 was born in 2004. She was 14 at the time her interaction with MCLAUGHLIN began and 15 at the time of the disclosed sexual abuse.

the two were planning to meet for sex. MV 5 reminded MCLAUGHLIN that she was 15 at that time. MCLAUGHLIN replied, “R u sure ur ready for me to come over to bend u over and fuck ur pussy.” MV 5 responded, “I’m ready if you’re ready.” From the context of the messages, appears likely MCLAUGHLIN did not meet with MV 5 that day. It appears likely that MCLAUGHLIN used the video chat function to masturbate on video in front of MV 5 In discussing a video chat, he wrote, “can I jack off?”

29. On July 27, 2020, MCLAUGHLIN offered \$250 to have MV 5 facilitate her 16-year-old sister, Minor Victim 6, record MV 5 performing fellatio on MCLAUGHLIN.

30. On August 6, 2020, it appears MCLAUGHLIN still had not followed through on his plans to meet MV 5 for sex. He wrote, “Ugh im scared i will get in trouble. If someone called the cops id go to jail. Ugh i want to so bad but im so scared it’s a trap.” In lieu of visiting, MCLAUGHLIN directed, “Video chat me and finger your pussy.”

31. On August 10, 2020, MCLAUGHLIN commented on a truck parked in front of MV 5’s house and asked, “Is someone home?” Later that night, MCLAUGHLIN wrote, “I already miss you.” MV 5 replied, “I miss you too baby.” MCLAUGHLIN continued, “Im sorry if u didnt want me fucking u that much [...] I feel so close to u like we’re brother and sister having sex its so great.” The conversation continued through at least October 4, 2020.

32. On July 7, 2023, MV 5, now age 18, was interviewed regarding her online and in person interactions with MCLAUGHLIN. During the interview, MV 5 disclosed that she recalled someone she met online whom she knew as “Jake.” MV 5 chatted with Jake on Snapchat for a while and Jake eventually came to MV 5’s house while MV 5’s

father was away at work. MV 5 did not recall exactly when this happened, but she recalled blocking him after this on Snapchat in 2020. When Jake came over, MV 5 expected they would watch a movie. Jake came inside and sat on the couch with MV 5 and MV 5's minor sister, MV 6. Jake moved MV 5 closer to where he was sitting on the couch and took MV 5's clothes off. He then pulled his pants down and sexually assaulted MV 5. MV 5 recalled she told Jake, "no," but he continued assaulting her anyway. MV 5 also recalled that her sister MV 6 left and locked herself in their father's bedroom as this happened. Jake ordered MV 6 to join, but she did not. MV 5 recalled that Jake inserting his penis into her vagina hurt her. Jake stopped when he was "satisfied enough," and squirted something onto her body. MV 5 said she felt scared and was physically hurt after this assault.

Minor Victim 7

33. Beginning on May 6, 2020, MCLAUGHLIN—using his lift11 account—chatted with a Snapchat ID associated with Minor Victim 7, a self-identified 15-year-old girl.¹² Within seconds of initiating the conversation, MCLAUGHLIN as "Jake" inquired, "so u like my big cock." The two discussed their sexual experience and MCLAUGHLIN's purported erect penis length. MCLAUGHLIN inquired, "can i see ur ass?" Shortly thereafter, he asked, "Can i see ur body better? Can u get naked in my [bed]?" Several hours later, as the conversation remained focused on sex and the possibility of meeting for sex, MCLAUGHLIN asked, "R u really 15?" MV 7 confirmed she was. In the late hours

¹² Minor Victim 7 was born in 2006 and was 14 years old at the time the chats began and when the sexual abuse occurred.

of May 6, 2020, MV 7 asked, “ok u got her new adress right? Wait. People are awake.” Shortly before midnight local time, MCLAUGHLIN wrote, “Ok leave ur house now.” Approximately 3 hours 20 minutes later, MV 7 wrote, “Did you even cum?” MCLAUGHLIN replied, “No.” Based on the context of the conversation, it appears there was another girl with MV 7 during this encounter.

34. On May 10, 2020, MCLAUGHLIN wrote, “Ur pussy is so tight.” MV 7 replied, “Weird question. What did I taste like?”

35. There was a break in the conversation between June 2020 and February 27, 2021. On that date, MCLAUGHLIN recontacted MV 7 and wrote, “Lets fuck.” He offered MV 7 \$200, but MV 7 declined stating she now had a boyfriend.

36. In her forensic interview on July 7, 2023, MV 7—now age 17—disclosed her recollections of meeting “Jake” in 2020. MV 7 recalled that the summer of 2020 was difficult for her. MV 7 was shown chats between lift11 and her own Snapchat account. She identified the chats as those she had with “Jake.” MV 7 met Jake through another minor friend, Minor Victim 8.¹³ MV 8 told MV 7 that she had “lost her virginity” to Jake in Jake’s car. MV 7 chatted with Jake, and one night when MV 7 was at MV 8’s house, they both snuck out late at night to meet with Jake. They walked down the road where Jake picked them up in his Jeep. Jake said he was taking them to his parents’ or grandparents’ house. Once they arrived at the house, they went upstairs to what he said was his parents’ or

¹³ The FBI has identified Minor Victim 8 as being born in 2006, and likely being 13-14 years old at the time of this interaction. Attempts to contact Minor Victim 8 are ongoing.

grandparents' bedroom and all three got on the bed. MV 8 began giving Jake "head," referring to oral sex. When Jake was ready for that to end, he had sex with MV 8. After this, he brought MV 7 over and removed her clothes. He then inserted his penis into MV 7's vagina. MV 7 was not aware if Jake ejaculated. After sex, MV 7 recalled she "made out" with Jake. She said she remembered this because she had never made out with anyone before. After Jake was done, he took MV 7 and MV 8 back to MV 8's house at dawn. MV 7 was nervous about what had happened and recalled her vagina bled a bit after the sex.

37. Based on the information provided in MV 7's forensic interview and chats stored in Snapchat account lift11, I believe it is likely the above-described sexual abuse of MV 7 occurred on or about the night of May 6, 2020 into on or about the early morning of May 7, 2020.

Minor Victim 9

38. On September 9, 2020, MCLAUGHLIN—using his lift11 account—contacted a Snapchat ID associated with Minor Victim 9, a self-identified 13-year-old girl.¹⁴ MCLAUGHLIN purported to be 16-year-old "Jake." MCLAUGHLIN claimed he had previously dated a 13-year-old, but the relationship ended because of "something about

¹⁴ Attempts to contact Minor Victim 9 are ongoing. While MV 9 has yet to be contacted, the FBI assesses she is an identified minor born in 2007, and would have been approximately 13 years old at the time of the conversations described.

my dick size.” After an exchange about “Jake’s” penis size, MCLAUGHLIN asked, “you’d really fuck me?”

39. The following morning, MCLAUGHLIN wrote, “I cant wait to get u naked.” He then discussed purported incest within his family and asked if MV 9 would consider “fucking my older brother or my dad.” MCLAUGHLIN asked, “is 24 to old?” MV 9 replied that 24 was not too old. MV 9 complained about having strict parents. In response, MCLAUGHLIN stated, “ever[y] girl should start fucking at 12. If I have kids 12 is the age there having sex. Even if im fucking my daughter or let my son and daughter fuck.” MCLAUGHLIN discussed receiving nudes from his “sister.” MV 9 replied by sending a photograph of a girl in underwear and wrote, “All you gotta do is ask.” MCLAUGHLIN claimed his “sister” sent “better nudes than u” and asked MV 9, “babe can show her up.”

40. On September 11, 2020, MCLAUGHLIN inquired, “Do u finger ur pussy?” He later asked MV 9, “did u take any pics for me?” In my training and experience, MCLAUGHLIN was likely inquiring if MV 9 had taken sexually explicit images. MV 9 replied, “No I have a vid saved on my phone.” MCLAUGHLIN asked, “can i see?”

41. On September 14, 2020, MV 9 provided MCLAUGHLIN her telephone number. MCLAUGHLIN claimed his “father” would text her. MV 9 confirmed she was receiving text messages. MCLAUGHLIN continued, “we want to jackoff to u. Send more pics my dad wants new once.” MV 9 declined, stating she was “just drained [right now].” MCLAUGHLIN persisted, “we just want to jackoff to u.” On September 15, 2020, the conversation continued. MV 9 wrote, “Getting ready for school but when I get home I’ll try to take a couple pics.” That evening, she wrote, “Once I’m done eating I’ll go to my

room and send sum for you and your dad.” That night, MCLAUGHLIN followed up writing, “Did u take pics? Does [your friend] know im going to fuck u? Send them.”

42. On September 18, 2020, MCLAUGHLIN continued discussing his interest in having sex with MV 9. He wrote, “I cant wait to watch my dads cock go in u [...] My dad would love some pics of u.” MV 9 then sent two images, including a file identified as b~EiQSFwTjZDZzS3hZb0hEZmRkbbkVXODFnVBoAGgAyAXxIAIAEYAE~v4.jpeg, an image depicting a naked pubescent girl posing with her anus and vagina fully visible. MCLAUGHLIN responded, “fuck.” About 10 minutes later, MCLAUGHLIN wrote, “my dads mad.” MV 9 replied, “I know.” MCLAUGHLIN demanded, “send him pics we cant risk not meeting. Just make him happy. Do anything he wants.”

43. Sometime around September 23-25, 2020, records show that MV 9 intended to meet with MCLAUGHLIN for sex with “Jake” and his father at a nearby hotel at MCLAUGHLIN’s direction. As the meeting approached, MV 9 backed out stating that some “family things came up.” The conversation tapered from that time, but continued through at least October 4, 2020.

Minor Victim 1

44. On April 19, 2021, MCLAUGHLIN using his lift11 account contacted a Snapchat ID associated with Minor Victim 1, a self-identified 15- or 16-year-old girl.¹⁵ MCLAUGHLIN purported to be 17-year-old “Jake.”

¹⁵ Minor Victim 1 is an identified minor, YOB 2006. MV 1 is now 16 years old. MV 1 was 14 years old at the time MCLAUGHLIN initially contacted her.

45. MV 1 stated she was with another minor girl. This child has been identified as Minor Victim 10.¹⁶ MCLAUGHLIN inquired, “Do u girls like to be eaten out? Get eaten out in a mustang might be hot.” He continued, “Can i see her ass Ive never ate black pussy.” Referring to his penis, MCLAUGHLIN offered, “Throw u 100\$ if u stroke it as she rides my face.” As the chat continued the following day, MCLAUGHLIN wrote, “Id pay u to fuck my ass with a strap on.”

46. On July 31, 2021, MCLAUGHLIN engaged MV 1 in a sexually graphic conversation. MCLAUGHLIN directed the minor, “Make me horny.” MV 1 replied, “Words or pics.” MCLAUGHLIN replied, “Pics.” MV 1 then sent a series of sexually explicit images and videos, including a data file identified as b~EiQSFVhaUndpcjc2aW5HZjRGWGgzcjZOTHoAGgAyAQNIAlAEYAE~v4.mp4, a video approximately nine seconds in duration depicting a closely framed view of a MV 1 masturbating and inserting fingers into her vagina.

Minor Victim 2

47. On June 9, 2022, MCLAUGHLIN—using his lift11 account—contacted a Snapchat ID associated with Minor Victim 2.¹⁷ From the context of the stored chat, it appears that not all the communications between the two were stored in the Snapchat records. MCLAUGHLIN began by sending a video depicting an unknown male

¹⁶ Minor Victim 10 was born in 2006. MV 10 is now 17 years old and was 15 at the time described here.

¹⁷ Minor Victim 2 was born in 2007. She is now 15 years old. MV 2 was 14 at the time the conversation with MCLAUGHLIN began.

masturbating and a photograph of what appears to be a stack of \$100 bills. MCLAUGHLIN wrote, “Id love to spoil u. Take u shopping.” A few days later, MV 2 responded with a photograph apparently depicting herself wearing a bra and shorts. MV 2 included two links to Amazon.com. As of June 20, 2023, the links directed to lingerie sets. MCLAUGHLIN replied, “Can i plz buy them for u?” MV 2 replied, “Medium for both would be good.”

48. On June 12, 2022, MCLAUGHLIN sent a photograph without any stored chat for context. The photograph is redacted below to remove sexually explicit nudity¹⁸—



49. Based on my investigation, I note the similarity between the person depicted in the above image sent to Minor Victim 2 and the person depicted in MCLAUGHLIN’s Minnesota driver license and believe MCLAUGHLIN is depicted above.

50. On June 15, 2022—without any stored chat for context—MV 2 sent MCLAUGHLIN a series of images, including an image identified as

¹⁸ The original image depicts a naked erect penis. The image is possibly digitally altered where the penis is visible.

b~EioSFU83SVFLTEoxeHNHVTRnY0twU2dwdRoAGgAiBgj0_suWBjIBA1AEYAE~v4.jpg, depicting MV 2 using her fingers to spread her labia and display the vaginal opening. During her forensic interview, MV 2 identified this and other images in the series as herself. Additionally, MV 2 identified one of the images from these records to be a screenshot of a CashApp profile with MV 2's first and last name sent to MCLAUGHLIN.

51. On June 18, 2022, the conversation restarted with MCLAUGHLIN writing, "Fuck I wasn't sure if you wanted to kiss me. I can buy booze for u or ur friends just have them hit me up [...] I got u I can take u all out on my boat to." MV 2 sent photos of one of her friends and wrote, "this is her high." MCLAUGHLIN replied, "I will buy wee[d] for u girls. Would u and her give me a handjob together?"

52. By June 23, 2022, MCLAUGHLIN displayed a dominant/submissive sexual relationship with MV 2 over Snapchat messages. MCLAUGHLIN wrote, "You will cum when daddy say or i will tie ur little whore ass up and fuck ur mouth tell i fill it with cum and make u drink it. At this point i own you. You will be trained on how to be a slut u will only say yes u will shut up do u job as a slut. I fuck u when i want. U suck dick when ur told. U say no i will hurt u tell u cry choking on my cock as i slap ur face and make sure u understand your my toy."

53. As mentioned above, from the context of stored chat messages—as well as information provided during the forensic interview of MV 2—a significant number of communications between the two is missing from the lift11 account. For example, there are no communications from July 2 through July 12, 2022. In my training and experience, the gap in stored chat messages may be due to the user deleting messages, use of one of

Snapchat's automatically deleting message types, or use of different chat platforms. MCLAUGHLIN picks up messaging MV 2 on July 16, 2022, "Can i fuck my little slut. I miss that already idc¹⁹ how sore u are [...] U should thank me everyday for letting you take my cock I deleted ever girl who wants my dick because now we had sex I only need you in my life i will treat u like a queen but fuck u like a worthless whore." The last stored outgoing message was sent July 29, 2022.

54. During her forensic interview, MV 2 disclosed that she recalled meeting "Caleb" on Snapchat after she learned from a friend that Caleb would pay girls for pictures. Similar to a statement made by MV 7, MV 2 disclosed that the summer of 2022 was particularly difficult for her. MV 2 recalled that Caleb sent her videos depicting girls who were "tied up" and having sex. Caleb said it was him in the videos. Caleb sent violent messages to MV 2, saying, "I wanna fuck you 'till you cry," and "I'm gonna leave bruises on your body."

55. MV 2 met with Caleb in person on multiple occasions. MV 2 recalled that Caleb offered money, alcohol, and smokeless nicotine products—primarily "vapes" and "vape juice." Caleb paid MV 2 at total of approximately \$500 and offered to pay her at least that much more, but did not follow through. Caleb picked up MV 2 at parks or parking lots in Ramsey County, Minnesota. He arrived in a large white work truck with tools and equipment in the back. He also said he had a black Ford Mustang.

¹⁹ "I don't care."

56. MV 2 disclosed that on one occasion, Caleb offered her \$500 to perform oral sex on him in the back of his truck. They got in the back seat of his truck and Caleb pulled out his penis through his pants and underwear. MV 2 recalled, “he took a video of me sucking it.” Caleb did not ejaculate and complained that it was taking too long. MV 2 identified herself in a still image taken from a data file stored in MCLAUGHLIN’s Snapchat account tech4cm. The file is identified as b~EiQSFw5DY29JODkwSldMaWVrd09KTldXUBoAGgAyAX1IAIAEYAE~v4.mp4, and is a video approximately one minute, 27 seconds in duration. It depicts MV 2 performing fellatio on an apparent prosthetic penis²⁰ seen protruding through MCLAUGHLIN’s pants fly hole. MV 2 disclosed her perception that she was in sexual contact with MCLAUGHLIN’s real penis. When asked about the appearance of MCLAUGHLIN’s penis, MV 2 mentioned that at age 14, she was unsure whether a penis should be “the same tan” as the rest of a man’s body. MCLAUGHLIN’s face can be seen at certain points of the video—

²⁰ Based on the visual information contained in this and other similar videos produced by MCLAUGHLIN and my training and experience, I assess that MCLAUGHLIN was very likely using a prosthetic penis. I make this assessment partially based on a discrepancy in the apparent skin tone of the penis, its movement, and the fact that MCLAUGHLIN never shows any area where the penis connects to the body. It is always seen sticking through the fly hole of his clothing and he often appears to hold it at its base to keep it in place.



Cropped still frame taken from video depicting MCLAUGHLIN sexually assaulting Minor Victim 2

57. This video file—along with another depicting similar content—was distributed by MCLAUGHLIN to multiple Snapchat accounts, some of which appear to have been used by other minor victims.

58. CashApp records show MCLAUGHLIN paid MV 2 a total of \$457 for the period of June 15, 2022, through December 15, 2022.

Minor Victim 3

59. On October 5, 2022, MCLAUGHLIN—using account tech4cm—contacted a Snapchat ID associated with Minor Victim 3.²¹ From the context of stored chats in Snapchat account tech4cm, it is apparent that not all of their communications were retained. On at least four occasions, MV 3 sent URLs linking to a GPS location, likely to

²¹ Minor Victim 3 is an identified minor born in 2007. MV 3 was 15 years old at the time of the first chat stored in tech4cm. She is now 16.

communicate with MCLAUGHLIN where she was physically located at that time. She also provided a CashApp identifier and discussed money and smokeless nicotine products with MCLAUGHLIN. There are no images to or from MV 3 stored in tech4cm.

60. CashApp records show MCLAUGHLIN paid MV 3 a total of \$840 for the period of November 29, 2022, through January 19, 2022.

61. In her forensic interview, MV 3 disclosed that she was introduced to “Caleb” through a friend—either Minor Victim 11 or Minor Victim 12.²² MV 3’s friend was getting money from Caleb in exchange for pictures. Caleb would send the girls “weird stuff,” including images and videos depicting his purported penis and videos purportedly depicting him engaged in sex acts with others. Caleb directed MV 3 to take and send pictures of herself—including directing her to take photos of her vagina or videos depicting herself masturbating. When MV 3 did not do what Caleb directed, he would increase the amount of money he offered. Caleb also offered to pay more if the girls took pictures or videos depicting all of them together.

62. Caleb told MV 3 he was 22 and from North Branch, Minnesota. MV 3 and her friends told Caleb they were all 17 years old. MV 3 recalled he would pick her up in a white work truck. Caleb told MV 3’s friends he was older than them. He told MV 3 he bought the girls alcohol, but did not have marijuana available.

²² In addition to information provided by MV 3 in her forensic interview, CashApp and Snapchat records reflect that both Minor Victim 11 and Minor Victim 12 are also very likely minor victims of MCLAUGHLIN.

63. MV 3 recalled she met Caleb in person several times. He would pick her up when she was away from home and take her to parking lots for sexual encounters. MV 3 recalled a parking lot behind an elementary school, a Washington County library location, and a construction site. After parking, Caleb had MV 3 get in the back seat. He then removed MV 3's clothes and inserted his penis into her vagina or directed her to perform fellatio on him. MV 3 was aware that on at least some of the occasions where Caleb had sexual contact with her, he was using a prosthetic penis.

64. On one occasion, Caleb picked up MV 3, MV 12, and another as yet unidentified minor girl. MV 3 recalled that Caleb took the three minors into the back of his truck one-at-a-time and had sex with each of them for 5-10 minutes each. MV 3 recalled while the other girls were having sex with Caleb, she put her headphones in and turned her music volume up. She dreaded her "turn." When it was MV 3's turn, Caleb took her clothes off and had sex with her. He slapped her a lot and left red marks. MV 3 felt that she might be responsible because she said yes when they talked over the phone before she was picked up, but did not make it clear to Caleb that she did not want to have sex with him when she was in his truck. Caleb inserted his penis and his fingers in her vagina. He left red marks on her posterior. He also choked her, pulled her hair, and said "gross things" about being her "daddy." MV 3 remembered Caleb left cash for the girls to take on their way out of the truck.

65. On one occasion, at a Washington County library parking lot, Caleb wanted to take pictures and videos having sex with MV 3. He placed his phone on the console of

his truck and recorded himself having intercourse with MV 3. He later sent that video to MV 3 and distributed it to other people MV 3 knew.

66. MV 3 identified herself depicted in a video file stored in tech4cm identified as b~EiQSFxHvZlVtYXB3TTUwbFpSQ29xY2lQWRoAGgAyAX1IA1AEYAE~v4.mp4. The file is a video approximately 39 seconds in duration. It depicts MCLAUGHLIN engaged in vaginal intercourse with MV 3 in the back of a truck. It appears likely MCLAUGHLIN is using the prosthetic penis—



Cropped still frame from video distributed by MCLAUGHLIN in tech4cm

67. Snapchat records reflect that a visually similar file (with different file identifiers) was distributed by MCLAUGHLIN on Snapchat account tech4cm to multiple accounts, some of which are controlled by as yet unidentified persons.

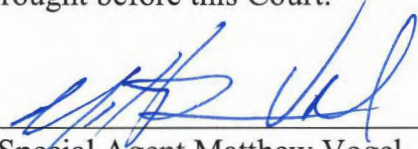
Additional Partially Identified Victims

68. At the time of this filing, the FBI is aware of several additional minor victims depicted in child pornography images stored in MCLAUGHLIN's Snapchat accounts and additional minor victims of sexual contact offenses disclosed in child/adolescent forensic interviews with the victims described above. This investigation and attempts to fully identify these minor victims are ongoing.

CONCLUSION

69. Based on the foregoing, I submit there is probable cause as charged in the proposed criminal complaint that CALEB VINCENT MCLAUGHLIN, in the District of Minnesota and elsewhere, has violated 18 U.S.C. §§ 2251(a) and (e), 18 U.S.C. §§ 2252(a)(2) and (b)(1), and 18 U.S.C. § 2422(b).

70. Accordingly, I request that a warrant issue for the arrest of CALEB VINCENT MCLAUGHLIN, that he may be brought before this Court.


Special Agent Matthew Vogel
United States Department of Justice
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and
email) pursuant to Fed. R. Crim. P. 41(d)(3)
on July 17, 2023


THE HONORABLE DULCE J. FOSTER
UNITED STATES MAGISTRATE JUDGE