

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brooke N. Harville, being duly sworn, depose and state the following:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (hereinafter "HSI"). I have been employed with HSI since May 2022. I possess a Bachelor of Science Degree in Psychology with a minor in Spanish, granted by the Florida State University. I have also completed over a year of graduate course work in public administration, homeland security and emergency management studies at the Florida State University. I am currently assigned to HSI, Special Agent in Charge, Tampa, Florida. I am currently assigned to investigate matters involving the online exploitation of children, particularly in relation to violations of 18 U.S.C. §§ 2251 and 2252, which criminalize the production, possession, receipt, and transmission of child sexual abuse material. I have investigated, conducted searches, and assisted with other agents' cases pertaining to these types of investigations. As a Special Agent, I am authorized to investigate violations of the laws of the United States and to execute arrest and search warrants issued under the authority of the United States.

2. I submit this affidavit in support of an application for a criminal complaint and arrest warrant for Justin Ryan CULMO ("CULMO"). This affidavit sets forth facts sufficient to establish probable cause to believe that CULMO produced and distributed child pornography, in violation of 18 U.S.C. §§ 2251(a) and 2252(a)(2).

3. The facts contained in this affidavit are drawn from personal knowledge based on my participation in this investigation, information from other criminal

investigators, law enforcement officers, agency reports, and the review of documents provided by witnesses and law enforcement officers. Because this affidavit is being submitted for the limited purpose of seeking authorization to arrest **CULMO**, I have not set forth each and every fact learned during the course of this investigation.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

4. **CULMO** has been linked to an online community of individuals who regularly produce, distribute, and receive child sexual abuse material via hidden service websites also known as darkweb sites, that operate on the Tor anonymity network. The websites described herein (“Website A1 and Website B2”) are exclusively dedicated to the sexual abuse of children. There is probable cause to believe that **CULMO** has produced and distributed child sexual abuse material on these sites and has been doing so using the screenname Avalanche and or TheRealAvalanche.

Background on Website A & Website B

5. As part of an ongoing child exploitation operation, HSI actively investigates individuals who produce, advertise and distribute child sexual abuse images and videos on various dark websites. For the purpose of this affidavit, HSI is

¹ The name of Website A is known to law enforcement. Investigation into the users of the website remain ongoing and disclosure of the name of the website would potentially alert active website users to the investigation, potentially provoking users to notify other users of law enforcement action, flee, and/or destroy evidence.

² The name of Website B is known to law enforcement. Investigation into the users of the website remain ongoing and disclosure of the names of the websites would potentially alert active website users to the investigation, potentially provoking users to notify other users of law enforcement action, flee, and/or destroy evidence.

referring to two sites on the darkweb that will hereinafter be referred to as “Website A” and “Website B” which are both websites dedicated to the sexual exploitation of children. Website A was a dark web forum site dedicated to boys and girls ages four to fourteen years old. Website A operated from approximately August 2014 to October 2015. In October of 2015, Website A was seized by a foreign law enforcement agency. Website B was a dark web forum site dedicated to boys and girls ages four to fourteen years old. Website B operated from approximately August 2016 to September 2017. In September of 2017, Website B was seized by a foreign law enforcement agency.

6. Through the course of ongoing undercover operations, HSI agents and other members of law enforcement around the world have been monitoring several dark web hidden services dedicated to the sexual abuse of children, including Website A and Website B. I know, from experience with such investigations, that it is typical for individuals to visit, access, or gain membership to more than one child exploitation hidden service at the same time.

7. Through the course of ongoing undercover operations, I am familiar with Website A and Website B and know that these sites required individuals to create a screenname and password in order to gain access to the site. New users had to choose a unique screenname; that is, they could not select a name already in use by another registered user.

8. HSI Special Agents are investigating an individual who has engaged in the production and distribution of child sexual abuse material on Website A and Website B. In this affidavit I will be describing the production and distribution of child

sexual abuse material on Website A and Website B by a specific individual using the screenname Avalanche and or TheRealAvalanche, but I will also reference activity (posting and commenting) by this individual on Website A and Website B.

Probable Cause

9. On or about July 19, 2023, HSI Tampa, Florida, received a Victim Identification Referral from the Cyber Crimes Center (“C3”) and the Victim Identification Task Force Operation Renewed Hope, involving a victim of child sexual abuse material (“CSAM”), in the Tampa, Florida, area. The victim of CSAM is believed to have been identified through facial recognition technology in the series named ‘12078 ANDREA2Y’ and ‘ANDREA.’³ Further analysis of these two CSAM series has revealed that additional series, ‘BinkyPink AKA Trina,’ ‘BoardGameStack AKA STACY1_4K,’ and ‘AVALANCHE/SPYCAM PICS’ are also believed to be produced by the same individual. These correlations are made by both law enforcement subject matter experts as well as analysts at both NCMEC and Interpol. The suspected producer uses the screenname(s) Avalanche and TheRealAvalanche.

10. On or about July 24, 2023, investigators from HSI Tampa reviewed the ‘12078 ANDREA2Y’ and ‘ANDREA’ series. The series contained approximately 175

³ ‘12078 ANDREA2Y’ and ‘ANDREA’ is a series identified by the National Center for Missing and Exploited Children (NCMEC). NCMEC experts review, categorize and name images and videos of child sexual abuse material in an effort to assist law enforcement in locating these victims of sexual abuse. Additionally, NCMEC coordinates with Interpol to add these series to the international database of child sexual abuse material (ICSE), this database is accessible to HSI as well as international law enforcement partners.

media files with 156 of those media files depicting child sexual abuse material. Three (3) files of child sexual abuse material, depicting what appears to be the same child, are described as follows:

- a. File Name: "Andrea 2Y 094.JPG" – This media file depicts a prepubescent female toddler. The toddler is laying on her back in a brown crib. The toddler is wearing a pink onesie. The onesie is unzipped, the diaper is partially removed, and the toddler's vagina is exposed. The toddler is surrounded by bedding including a multi-colored striped blanket. The toddler's face is covered by a pink pig plush toy. An erect male penis is seen between the brown crib slats near the toddler.
- b. File Name: "sexibl_Andrea+2Y+063" – This media file depicts a prepubescent female toddler. The toddler is laying on her side and is surrounded by bedding. The toddler is nude from the waist down. A person is seen using their hand to separate the toddler's buttock thereby exposing the toddler's anus.
- c. File Name: "Andrea 2Y 039" – This media file depicts a prepubescent female toddler laying on her back in a brown crib. The toddler is surrounded by bedding and a black and yellow plush toy. The toddler is partially clothed and wearing a blue top. The toddler's blue bottoms are pulled down below her knees and her diaper is partially removed. The toddler's legs are spread apart, and her vagina is exposed.

11. On or about July 31, 2023, Minor Victim 1 (MV1) was positively identified by her mother in series '12078 ANDREA2Y' and 'ANDREA.' MV1's mother believes the pictures were taken between 2011 and 2014, making MV1 between the ages of 1 and 4 years old at the time images were produced. MV1's mother believed

they were residing in Hudson, Florida, in the Middle District of Florida, at the time the pictures were taken.

12. MV1's father recalled his work friend, Justin **CULMO**, coming to their residence in Hudson, Florida. MV1's father was working in the back yard and **CULMO** went inside the home. When the father entered his residence, he encountered **CULMO**, next to his daughter, in the first-floor bedroom. The father confronted **CULMO**. **CULMO** became very quiet, did not respond, and left the house within 30 minutes. The father advised that **CULMO** had visited them, at their home, approximately 12 times prior to this incident and to his recollection, **CULMO** never visited the residence after that.

13. On or about August 21, 2023, MV1's parents provided investigators screenshots of social media photos posted by **CULMO**. On November 13, 2012, in a post titled "pix from my visit," **CULMO** posted photos of MV1 with the same multi-colored striped blanket and brown couch depicted in the series, '12078 ANDREA2Y' and 'ANDREA.'

14. On or about August 2, 2023, HSI Tampa received the additional series named 'BinkyPink AKA Trina'. The series 'ANDREA' and 'BinkyPink AKA Trina' both contained media files that depicted sexual abuse material of prepubescent female children as well as an erect male penis.

15. The series 'ANDREA' contained media files that depicted sexual abuse material of prepubescent female children as well as a distinctive and unmanipulated erect adult male penis.

16. The series 'BinkyPink AKA Trina' also contained media files that depicted sexual abuse material of prepubescent female children as well as a blurred adult male penis that appears to have the same distinctive characteristics of the 'ANDREA' series.

17. On or about August 4, 2023, I received two Child Protective Services reports from Pasco County Sheriff's Office, detailing child sexual abuse allegations made against **CULMO**. The following is a summary of the information provided:

Intake Date:	06/12/2014
Intake Time:	12:23 PM
Alleged Victim:	Minor Victim 2 (MV2)
Address:	██
Alleged Perpetrator:	Justin CUMO (DOB: 6/28/1984) ⁴
Address:	██

Narrative: "On 06/11/14 MV2 told her mother that Mr. Cumo had touched her. It is unknown where he touched her. It is believed the touch may have been sexual in nature. Mr. Cumo was last alone with the MV2 on 06/02/14 while he babysat MV2 while the mother was at work. MV2 has started having nightmares. MV2 has been heard saying "don't touch me" while having a nightmare. MV2 had a bruise on her inner and outer thigh last week. When asked what had happened MV2 said she had fallen.

⁴ SA Harville spoke to a Child Protective Investigator Supervisor, who confirmed the subject of the report is Justin **CULMO**. The personal identifiers for **CUMO** and **CULMO** are the same. I believe the references to **CUMO** in the child protective services report are a typo.

The details of the fall are unknown. Last week Mr. Cumo was seen trying to sit next to MV2. MV2 told Mr. Cumo "Don't touch me, you are bad." It is unknown what this means. MV2 behavior has recently changed. She went from being pretty out going to keeping more to herself. The mother and Mr. Cumo are friends and hang out a lot. Mr. Cumo does not reside in the home and does not have access to the child. In the past little girl's underwear were found in Mr. Cumo's home. No other details are known about the underwear."

Intake Date: 2/24/2019
Intake Time: 9:31 PM
Alleged Victim: Minor Victim 3 (MV3)
Address: [REDACTED]
Alleged Perpetrator: Justin CULMO (DOB: 6/28/1984)
Address: [REDACTED]

Narrative: "This evening, Justin allegedly took a picture of the MV3's "private parts". MV3 went over to the home to play with dolls with Eliza, the neighbor, after the park. MV3's father went over to the home to check on her. MV3 wasn't ready to leave at that time. MV3's father informed her that he would pick her up in 45 minutes for dinner. Later on that evening, MV3's father gave her a bath. MV3 has a medical condition where her labia is fused together by her skin. As the father was washing MV3, the father informed her that it was only appropriate for him and the mother to touch her "poochella", also known as her vaginal area. The father told MV3 that no one is ever allowed to touch her there. When MV3 was asked if she had ever been touched, she responded by saying "no". MV3 then stated, "Izzy's dad touched my poochella". MV3 indicated that Eliza's father pulled her pants down to her thigh and touched her "poochella". She then stated that he took out his phone and

took a picture. “Izzy” was playing at the time of the incident. Her mother was in the shower. The incident occurred after MV3’s father left the home.”

18. On approximately August 21, 2023, I contacted HSI Portland regarding this investigation. HSI Portland Agents have been conducting similar investigations on darkweb users for approximately eight years. HSI Portland Agents were familiar with the individual using the screenname Avalanche/TheRealAvalanche and the various darkweb sites/forums the user was active on. HSI Agents conducted further review of the individual using the screenname Avalanche/TheRealAvalanche and revealed that this individual was active on various darkweb sites dedicated to the sexual abuse of children since approximately 2012. HSI Agents reviewed posts created by the individual using the screenname Avalanche/TheRealAvalanche. A sample of these posts as they relate to the series of child sexual abuse that was produced is as follows:

12078 ANDREA2Y/ ANDREA (2014 timeframe)

From: Avalanche

Date/Time: 2014-09-11, 19:10:02 UTC

Subject: Re: andrea 2yo

Site: Website A

- a. *“Hey, would ya look at that. The Andrea Series is getting around, That makes me happy. I see, however, it is quite incomplete, particularly the 3D files⁵. You*

⁵ A 2D image has only height and width. The term 3D is sometimes used to describe a physical item such as a sculpture which would have not only height and width but also depth. A Stereoscopic 3D file can be viewed using “3D glasses” and will create the depth or the illusion of depth.

can look up how to view Stereoscopic 3D files, or they can be converted to any usable 3D image format. Allow me to make a more complete posting for you.”

BINKYPINK AKA TRINA (2016 timeframe)

From: Avalanche

Date/Time: 2016-09-17, 21:05:59 UTC

Subject: RE: Anyone got busted or punished for CP?

Site: Website B

- a. *“Around the time I was making the Trina set, I dated a woman with an 11 year old. Too old to do anything funny, but I used to let her cuddle with me and I'd massage her, etc when we were alone. The mother came home early and the girl was REALLY on top of me, cuddling, rubbing, legs wrapped around. Probably wouldn't have been a huge issue, except we both panicked. We both almost fell right off the couch in surprise.”*
- b. *“Possibly the worst one was when a girl and her mom crashed at my place. Everyone was asleep in different rooms. I snuck out in the middle of the night to the couch the girl was sleeping on. Whipped out my dick, put her hand on it, rubbed my dick on her face, pulled her nitegown up, etc. Didn't notice this, the mother had relocated and was sleeping on the couch, nearby. She could've easily seen me, I'm not sure if she did or not. We remained friends for a long time afterwards and I would see her daughter, but every so often, there would be hints to suggest she knew something.”*
- c. *“Oh, and I was almost caught with Trina. With Trina (the set), the couple of women I was hanging with went out to the store, left me alone with the kids to*

watch. Trina was sleeping in our bed for the night. I had the good sense to lock the bedroom door, but, turns out the lock didn't work. I was fortunate enough to get my dick back in my pants the second the door handle turned because my GF forgot her wallet."

From: Avalanche

Date/Time: 2014-11-22, 14:44:09 UTC

Subject: Re: The set you've been asking me for: Trina 4Y 2D-3D

Site: Website A

- a. *"She was fun. The fact that she was still wearing diapers at her age made it all the more easier for her to be ok with me taking her clothes off, her spreading, me wiping, fingering, etc. Instantly lie down and assume the position for me to clean you up."*
- b. *"Funny story, because I was babysitting, I was in the bed with my GF and this little one, both were just passed out from a late night, but I was pumped up on the adrenaline of having this cute thing all to myself. I cuddled her up all night and at some point, I got her diaper back off and started to quietly fuck her thighs and slit. When I say I came buckets, it felt like my dick didn't stop for 30 seconds, I pushed my dick hard against her little hole and just came and came. After it was over, it was like a scene from Something About Mary. I felt around, like "Where'dd it go?" I wasn't wet, she wasn't wet, the bedsheets weren't wet. I stuck my finger in her little slit and I could feel some cum in there. I guess she took the entire load. I put her diaper back on and went back to sleep."*

From: Avalanche

Date/Time: 2016-10-02, 17:48:32 UTC

Subject: Avalanche App VIP

Site: Website B

- a. *I'm still editing and releasing Trina vids, also working on an upskirt and candid series, and have a ton of toilet cams and other stuff.*

BoardGameStacks AKA STACY1_4K (2016 timeframe)

From: TheRealAvalanche

Date/Time: 2016-12-28, 14:56:23 UTC

Subject: RE: Stacy1_4K

Site: Website B

- a. *"It's real 4K from a phone, don't expect any drastic improvement, I slected the best bitrate for the video quality. Older computers are more difficult to play 4k on. If VLC doesn't work, use MPC. Also, this was a VIP video from TGE, but I expected it would eventually get out."*
- b. *"I will put more effort into this series, but I really have to finish up the Trina Videos, there are 4 in all, 3 released. Losing the Giftbox took a hit, but I also have other IRL matters to deal with, so I haven't been as active."*

From: Avalanche

Date/Time: 2016-10-02, 17:48:32

Subject: Avalanche App VIP

Site: Website B

- a. *"This is a new one, I'm calling her Stacy. Mostly taking pictures and molesting."*

- b. *"Since it was brought up, I realized I could up the resolution to the source file to 4k. I toned it down on the watermark, but I like my laughing man, so deal with it."*
- c. *"This is the first of about 4-5 Vids, I'm still deciding on how much I want to put out. I'm already anticipating my stuff will eventually get leaked, I don't really care, but I like to sit on my content as long as I can in order to disassociate myself from memory and let the girl age a little."*
- d. *"Stacy was about 5 or so. My voice replaced with subtitles."*

SPYCAM PICS

From: Avalanche

Date/Time: 2014-09-16, 22:33:08 UTC

Subject: Re: Spycam

Site: Website A

- a. *"I've had a lot of luck with potty cams, see pix below. The hardest part about bathroom cams is the shape of the room and sometimes a lack of non-functional objects that a camera can be placed inside. You can't pick an object that someone might want to pick up or use, has to be completely non-functional, like a decoration or a piece of furniture. The object has to be directly in front of the toilet, which means it might be stared at for good lengths of time, even by adults. You also might not have enough room to place something right in front of the bowl. Scrutiny is the hardest part to overcome."*
- b. *"My luck is with 808 cams. I prefer the 1080p cams (#26 or HT-F1), image quality is great if you can set the light right. Have lots of lighting, but no actual*

lights should be seen by the camera. The 808 cams last about an hour of recording time with no external source, external batteries can last 3-12 hours, a 32GB TF card will last about 5 hours at 1080p. Also, the mentioned cams come with a cord that works like a dashcam, when power is applied, it begins recording, when power is removed, the recording is saved and the cam is turned off."

- c. *"Some downfalls. the 1080p cams get HOT when left recording over extended periods of time. Using external battery and multiple cards, I can go about 10 hours at a time of continuous shooting. Also with continuous shooting, you have a lot of video to go through. The #26 is metal, which lets it cool itself, but after an hour+ of recording it still is so hot I can't touch it, very dangerous, The HT-F1 is plastic, so it's only warm to the touch, but the chipset gets so hot, video begins to corrupt. The HT-F1 has motion detection, but that doesn't stop it from getting hot and corrupting. With both, the warmer it gets, the lower quality of video and lower bitrate. You will see this in the pictures. I am working on a solution so that the camera only activates when someone is in the bathroom, but the built-in motion detection doesn't work well for my needs. You also have to account for changing out the SD card after about 5 hours of video. Easy access is key and no one can see you do it or will easily gain access to the compartment that the cam is hidden."*
- d. *"Where to hide? Well, I'll leave that up to you. Pinholes don't work, I have not made any objects that don't look suspicious by putting a pinhole in it and sticking a camera inside. You want patterns and solid objects, stuff that breaks up the shape of a lens. Think of solid black plexiglas or wicker patterns."*

19. HSI Agents also located postings by the individual using the screenname Avalanche and TheRealAvalanche regarding the use of encryption and how to react if you are caught or suspected to have molested a child:

From: Avalanche

Date/Time: 2016-09-18, 13:31:12 UTC

Subject: RE: Anyone got busted or punished for CP?

Site: Website B

- a. *“Keep your shit encrypted, Veracrypt is the current standard. If the container is closed, you're safe, you don't need physical means to destroy your computer and possibly harm an LEO, while you're at it. Here's some tips.”*
- b. *“CP on nothing except your CP machine. Keep it off your cameras, cell phones, tablets, flash drives, other computers, and so on. Every bit of CP goes into encrypted space. When you do have stuff on other devices, clean it up quick and thoroughly. If you have friends and family, have a separate computer for them to see and use. Good network, good firewall for the machine with CP, to prevent network breaches.”*
- c. *“3 encrypted drives: One queue for your uploads and downloads, one that you open just to archive, one that you back up and keep off site. Keep in a secured location no one knows about, it's encrypted, so even if someone finds it, they can't use it. I keep mine off site because I don't want to lose my collection if there is a fire or all my stuff is seized.”*
- d. *“Power kill your machine with some sort of access sensor. Keep the computer in a nice cabinet or desk with good airflow, the cabinet should be tight enough that*

the computer cannot be opened without removing it from the cabinet. Convenient unlocked access door to get to machine. If someone opens the door, power is cut to the computer, encrypted data is safe. The police are almost never prepared for a cold boot attack, and even if they were, this method buys a lot of time. It's also a good defense for you to know if your machine has been accessed and prevent an Evil Maid or Stoned Boot attack."

- e. "Always clean up loose ends and lock your OS whenever you walk away. Just good measure against prying eyes."*
- f. "Most users will not be caught for downloading CP on the darkweb, they will get caught because someone found CP on their cell phone or because they were caught with a child or because the police had some other reason to enter and seize."*

From: Avalanche

Date/Time: 2014-09-16, 21:25:50 UTC

Subject: Re: anyone know the way to get little child?

Site: Website A

- a. "Have your way with the children for a little while, get videos, pictures, etc, and then suddenly disappear."*

20. A review of publicly available and law enforcement databases revealed that CULMO is a mechanical engineer and worked at [REDACTED] located [REDACTED] between January 2008 and March 2010. CULMO is also an avid photographer with various photography websites he appears to have designed himself to include: ninety-9.com. Additionally, HSI Agents located

the following email accounts associated with **CULMO**: justin@ninety9.com, jculmo@blackplanet.com, jsax@tampabay.rr.com, justinculmo@hotmail.com, jsaxophone4@email.com. Given this information, HSI Agents conducted a search of usernames on darkweb sites dedicated to the sexual abuse of children and located a user with the screen name: jsaxophone.

21. On August 23, 2023, HSI Agents spoke with the parents of MV1 with regard to **CULMO** and hobbies he was known to have. HSI learned that **CULMO** is a saxophone player.

22. On or about July 31, 2023, a search of the Florida Driver and Vehicle Information Database (DAVID) revealed the following information for Justin Ryan **CULMO**, including the following information:

Name:	Justin Ryan CULMO
Date of Birth:	06/█/1984
Residential Address:	██
Change Date:	06/30/2017
Residential Address:	██
Change Date:	06/27/2013
Residential Address:	██
Change Date:	06/18/2009

Vehicles Registered:	1999 Red Nissan 4-Door (██████████)
	2015 Red Nissan Pickup (██████████)
	1994 Trailer (██████████)
	2022 Gray Ram Truck (██████████)

23. On or about August 7, 2023, an open-source search and wages and employment record search on Justin Ryan CULMO revealed the following information:

Name: Justin CULMO

Legal Entity Name: [REDACTED]

Address: [REDACTED]

First Quarter: January 2008

Last Quarter: March 2010

Name: Justin CULMO

Legal Entity Name: [REDACTED]

Address: [REDACTED]

First Quarter: January 2008

Last Quarter: March 2010

Name: Justin CULMO

Legal Entity Name: [REDACTED]

Address: [REDACTED]

First Quarter: January 2015

Last Quarter: March 2017

Name: Justin CULMO

Legal Entity Name: [REDACTED]

Address: [REDACTED]

First Quarter: April 2017

Last Quarter: February 2023

24. On or about August 4, 2023, open-source intelligence revealed **CULMO** is married to [REDACTED] and they have [REDACTED] minor children.

25. HSI Agents located a report from Hillsborough County Sheriff Office from July 27, 2017, regarding an incident that occurred with **CULMO** and his former employer, [REDACTED]. In summary, **CULMO** was required to surrender a SD card that was company property (that was secreted in his shoe). Upon review of the SD card, the employer located a folder named "Jersey Avenue." This folder contained approximately 1,155 (5.85GB) photographs of young girls coming and going from Mann Middle School in Brandon, FL. The school is located at 409 E Jersey Ave, Brandon, FL, and it was reported by the employer that **CULMO** was living across the street at [REDACTED] at that time.

26. On or about August 30, 2023, I conducted an open search of the address [REDACTED] a prior known residence of **CULMO**. Open-source research revealed a publicly available image of a bathroom located at [REDACTED]. The picture depicts a bathroom with light blue square tile on the wall with white grout. The tile wall is behind the toilet and on the wall right of the toilet. The toilet is white in color with a beveled tank and has a chrome handle on the left side. A two-door wall cabinet is directly above the toilet. There are approximately six square wall tiles from the floor base board to the top of the toilet.

27. The AVALANCHE/SPYCAM PICS series contains approximately six child sexual abuse images in which pre-pubescent girls are standing in front of a toilet

with their vaginas as the focus of the image. Approximately 3 of the 6 media files depict a bathroom with a toilet that is white in color with a beveled tank and a light blue tile wall like the bathroom pictured at [REDACTED]. One of the 3 media files also depicted a chrome-colored toilet handle on the left side of the toilet. In 1 of the 3 pictures HSI Agents are able to count 6 tiles from the base board to the top of the toilet.

28. On or about September 26, 2023, HSI Tampa executed a federal search warrant at [REDACTED]. Justin Ryan CULMO (DOB: 6/ [REDACTED]/1984) was present at the residence at the time of the search.

29. After *Miranda* advisement and waiver, HSI Tampa interviewed CULMO and learned the following information: CULMO admitted to using the screenname(s) Avalanche/TheRealAvalanche. CULMO admitted to producing the images identified in the child sexual abuse series: ANDREA2Y' and 'ANDREA; BinkyPink AKA Trina; and STACY1_4K. CULMO admitted to producing images of child sexual abuse of both of his daughters, the most recent production occurring this past weekend, September 22-25, 2023.

30. In a locked drawer in CULMO's desk, HSI agents found 11 pairs of female, child underwear and 5 spy cameras.

31. During a forensic preview of CULMO's electronic devices, HSI Tampa Computer Forensic Analysts discovered multiple videos depicting prepubescent children in varying phases of undress while using the bathroom. These videos appear

to be recorded from a hidden camera placed in a concealed and strategic location aimed specifically at the toilet where someone would utilize the bathroom. Some media files depict exposed, prepubescent child vaginas, while another media file depicts a prepubescent child penis. Agents visually compared the media files to the bathroom in **CULMO's** home. Agents were able to confirm that **CULMO's** bathroom was the location where the spycam videos were recorded. The bathroom is directly adjacent to both of **CULMO's** daughter's bedrooms.

32. Three files of child sexual exploitation material, recorded in **CULMO's** bathroom are as follows:

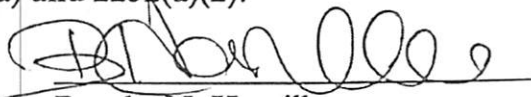
- a. File Name: "20220812_163621" – This media file is approximately one minute and 34 seconds and depicts an approximately four to seven year old female child undressing while using the bathroom;
- b. File Name: "20220814_080751" – This media file is approximately five minutes long and depicts an approximately six to nine year old female child undressing while using the bathroom; and
- c. File Name: "20220814_172644" – This media file is approximately five minutes long and depicts an approximately two to five year old male child undressing and using the bathroom. An adult male, appearing to be **CULMO**, enters the bathroom and wipes the boys bottom.

33. On or about September 26, 2023, HSI Tampa interviewed [REDACTED]. [REDACTED] was shown sanitized images of the penis depicted in the 'ANDREA' series. [REDACTED] advised that she believes the penis depicted is **CULMO's**

penis based on the color difference above and below the circumcision scar and the color of the vein on the penis.

CONCLUSION

34. Based on the foregoing facts, there is probable cause to believe that CULMO produced and distributed child pornography, in violation of Title 18, United States Code, Sections 2251(a) and 2252(a)(2).



Brooke N. Harville
Special Agent
Homeland Security Investigations

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 4(d) before me this 26 day of September, 2023.



HONORABLE AMANDA A. SANSONE
United States Magistrate Judge

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Middle District of Florida

United States of America
v.
Justin Ryan Culmo

Case No.

8:23MJ2199AAS

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Justin Ryan Culmo,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Production and distribution of child pornography, in violation of 18 U.S.C §§ 2251 and 2252(a)(2).

Date: September 26, 2023

Amanda Arnold Sanson
Issuing officer's signature

City and state: Tampa, FL

Amanda Arnold Sanson, USMJ
Printed name and title

Return	
This warrant was received on (date) _____, and the person was arrested on (date) _____ at (city and state) _____	
Date: _____	_____ Arresting officer's signature
	_____ Printed name and title

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This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Justin Ryan Culmo

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____