

FILED

Dec 23, 2020

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of California

United States of America
v.
NATHAN DANIEL LARSON

Case No. 1:20-mj-00147-BAM

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov. 22, 2020 - Dec. 14, 2020 in the county of Fresno in the
Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1201	- Kidnapping
18 USC 2251(a)	- Sexual Exploitation of a Minor
18 USC 2252(a)(2)	- Receipt and Distribution of Child Pornography
18 USC 2421	- Interstate Transportation of Individual with Intent that Such Individual Engage in Illegal Sexual Activity
18 USC 2422(b)	- Coercion and Enticement of Minor to Engage in Illegal Sexual Activity

This criminal complaint is based on these facts:

See attached affidavit of HSI SA Dada D. Cheam, attached hereto and incorporated herein by this reference.

☒ Continued on the attached sheet.*Complainant's signature*

Dada D. Cheam, Special Agent

*Printed name and title*Sworn to me in accordance with Fed.R.Crim.P. 4.1 by email
and telephone.Date: 12/22/2020*Judge's signature*City and state: Fresno, California

Hon. Barbara A. McAuliffe - U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AGAINST
NATHAN DANIEL LARSON

I, Dada Cheam, being duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent (SA) of Homeland Security Investigations (HSI) since July 2008, and I am currently assigned to the Office of the Resident Agent in Charge, Fresno, California. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. Prior to my current office assignment, I was stationed at the Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) Office in San Francisco, California since September 2005. I have attended the Federal Law Enforcement Training Center (FLETC) and completed the Criminal Investigator Training Program (CITP) and ICE/HSI Special Agent Training program. As part of my daily duties as an HSI SA, I investigate criminal violations by persons relating to the unlawful possession, receipt, and distribution of child pornography,

as well as violations by persons relating to the online coercion and enticement of minors to engage in illegal sex acts. I have received training in the area of Sexual Exploitation of Minors/Child Exploitation and Child Pornography statutes. During the course of my duties, I have participated in multiple cases involving unlawful possession, receipt, and distribution of child pornography. I am currently a member of the Central Valley Internet Crimes Against Children (ICAC) task force and I have participated in the service of dozens of state and federal search warrants relating to the internet, including the receipt, distribution, and possession of child pornography.

2. This affidavit supports a criminal complaint against Nathan Daniel LARSON for violating the following federal statutes:

a. 18 U.S.C. § 1201, which prohibits the unlawful seizure, confinement, inveigle, decoy, kidnap, abduction, or carrying away of any person, for ransom, reward, or other benefit, and intentional transport of such person across state lines;

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b. 18 U.S.C. § 2251, which prohibits the knowing employment, use, persuasion, or coercion of a minor to take part in sexually explicit conduct, and for the purpose of producing a visual depiction of such conduct;

c. 18 U.S.C. § 2252(a)(2), which prohibits certain activities relating to material involving the sexual exploitation of minors, including the receipt and/or distribution of child pornography;

d. 18 U.S.C. § 2421, which prohibits the knowing transport of an individual in interstate commerce with the intent that such individual engage in illegal sexual activity; and

e. 18 U.S.C. § 2422(b), which prohibits the knowing use, or attempted use, of a facility or means of Interstate commerce to persuade, induce, entice, or coerce a person under the age of 18 to engage in illegal sexual activity.

3. The information contained in this affidavit is based upon my personal observations, training and experience, and where noted, information related to me by other law enforcement officers and/or agents.

4. On December 14, 2020, the mother of a 12-year-old female contacted the Fresno County Sheriff's Department

(FCSD) and reported that her daughter (hereinafter referred as Confidential Victim or "CV") had possibly run away during the night. According to the mother, she woke up and discovered that CV was missing and determined CV had packed a bag and taken her Lenovo laptop computer. Fresno Police Department (FPD) Officers responded to the location and discovered video footage from a neighbor's Ring doorbell that displayed a red pickup truck stop in front of the CV's residence at approximately 0230 hours and leave after a minute. The video footage did not capture who was inside the vehicle due to the lack of lighting at the time.

5. On the same date, FPD Detectives interviewed CV's minor friend with his mother present. The CV's friend stated CV had recently been in contact, through the on-line gaming application Discord ("DISCORD"), with a person named "Nathan Larson". The CV communicated with LARSON through DISCORD, as well as on a rape/kidnap fetish website with a web address suggesting that it was located in Europe (hereinafter "WEBSITE"). CV began telling CV's friend about first communicating with LARSON approximately a few weeks prior, and had sent him LARSON's Wikipedia page. The CV told CV's friend that LARSON had pressured her into sending him (LARSON) sexually explicit images of herself, revealing her full frontal nudity, through the WEBSITE, and

which she admitted to sending to LARSON pursuant to his requests soon thereafter.

6. CV also told CV's friend that she was in love with LARSON. The CV used the DISCORD account names "vomitslushee#3258" (which she likewise used as her account name on the offshore WEBSITE), as well as "dollybrainz#4048". The mother of CV's friend showed Detectives a screenshot of CV's username of "ewwieme" from the offshore WEBSITE and also pointed out a username of "wristslit69996", which CV's friend's mother had reported to be the suspect's username on the Kik social media application. CV's friend's mother also reported that CV posted the same username "ewwieme" on both the WEBSITE, as well as Discord.

7. In reviewing the screenshots of CV's account on the WEBSITE that were provided to law enforcement by the mother of CV's friend, FPD Detectives located CV's profile listing her as 12 years old from California and as having joined the WEBSITE on 11/13/2020. On that same date, CV posted on the WEBSITE "I wanna b kidnapped but m also scared". Then on 11/22/2020, a subject wrote "Hey I can kidnap you I'm 25 yo if you interested send me a message on Kik to wristslit69996".

8. FPD Detective Cassandra Stevens conducted searches on the internet for "Nathan Larson" and identified a Nathan Larson (DOB 09/19/1980) from several articles and a Wikipedia page. In a USA Today article by William Cummings and dated 06/02/2018, LARSON's photograph is displayed and contained information that he had run for a Congressional seat in the State of Virginia where he lives. The article said LARSON was an advocate for "pedophilia, white supremacy and rape" and his Wikipedia page said that in 2017, LARSON's platform for his election to the Virginia House was to legalize child pornography and polygyny and to remove women's right to vote and access to education.

9. On the same day, December 14, 2020, investigators learned from one of CV's relatives that he contacted the Fresno airport and, after displaying a photograph of CV to ticket agents, was advised by a Frontier Airlines ticket agent that she remembered that CV had boarded a flight out of Fresno, CA with an "older" white male. The airline confirmed that the CV was on Frontier Flight #494 with "Nathan Larson" and the plane was about to land in Denver, Colorado with a destination of Washington, D.C. The Fresno PD then contacted Denver PD, who intercepted and detained LARSON and the CV at the Denver airport. During the arrest of LARSON, law enforcement seized two electronic devices

(Samsung tablet and Samsung Galaxy cellphone) as well as airline tickets from Washington, D.C. to Fresno, CA on 12/13/2020 and LARSON's and the CV's airline tickets from Fresno, CA to Washington, D.C. on 12/14/2020. The CV's Lenovo laptop was also seized.

10. Pursuant to an on-scene interview of the CV, information was conveyed to FPD Detective Cassandra Stevens that the CV provided officers consent to search her laptop and had told officers that she had sent LARSON sexually explicit images of herself upon his insistence when they chatted online. The CV stated her images would possibly still be on her laptop.

11. On December 15, 2020, the CV was interviewed at the Family Healing Center by a forensic interview specialist. The CV identified LARSON as being 40 years old and the person that picked her up from her house and traveled with on December 14, 2020 to go to Virginia. The CV believed it was illegal for LARSON to travel with because LARSON was much older than CV and CV's parents did not consent for her to leave California. While at the Fresno airport, CV stated LARSON began kissing her and using his hand to touch all over her body while they were waiting for their flight outside of the airport. The CV stated LARSON knew she was 12 years old based on her

WEBSITE account profile and also she told him her age during their online chats. She also provided her name and date of birth to LARSON to purchase the airline ticket. The CV said she posted sexually explicit pictures of herself on her "confirmed" profile "ewwieme" at the request of LARSON to his website, later identified as the aforementioned offshore rape and kidnap fetish WEBSITE. The CV explained that to be a "confirmed" user and have access to a private image gallery on the WEBSITE, she had to send a sexually explicit picture of herself with the WEBSITE's address written somewhere on her body to an administrator of the WEBSITE. The CV stated LARSON told her his plan was to take her virginity and get her pregnant at 13 in Virginia.

12. On December 18, 2020 and pursuant to CV's signed consent to assume online presence, FPD Detective Stevens accessed the WEBSITE with CV's username "ewwieme" and password and located a conversation with username "Leucosticte" that was initiated on 11/15/2020. "Leucosticte" was identified as LARSON from the December 15, 2020 interview of the CV. The following is a summary of the conversation and associated date.

ewwieme	Hi Nathan!! can i b verified now?? i posted my lewds faor the first time!	Nov 15, 2020
Leucosticte	Do what it says here Policy The confirmation standards for men and women	Nov 15, 2020
Leucosticte	what are you up to	Nov 27, 2020
Leucosticte	feeling horny today?	Nov 27, 2020
ewwieme	hehe kinda	Nov 27, 2020
ewwieme	i wanna talk to uuu	Nov 27, 2020
ewwieme	ur super cool	Nov 27, 2020
ewwieme	but idk what to talk about lol	Nov 27, 2020
Leucosticte	hmm and I've already seen you nekkid, or at least the bottom 90% of you	Nov 27, 2020
Leucosticte	did you ever send an ass pic, I can't remember	Nov 27, 2020
ewwieme	Yepp	Nov 27, 2020
Leucosticte	you're so cute. https://faerie.su/threads/bro-i-have-makeup.26/ I'm happy that you started showing your face in your pics now	Nov 30, 2020

ewwieme	ty >/// 	Nov 30, 2020
Leucosticte	I want so badly to see you with your legs up showing your pussy all the way back to you ass	Nov 30, 2020
ewwieme	ok! will do <3	Nov 30, 2020
ewwieme	yk, i would be willing to run away with u	Nov 30, 2020
Leucosticte	(penis twitches at the thought)	Nov 30, 2020
Leucosticte	That would be sooooooooo nice	Nov 30, 2020
ewwieme	yea :>	Nov 30, 2020
ewwieme	i just posted more for u~	Dec 1, 2020
ewwieme	do u like what I posted :>	Dec 1, 2020
Leucosticte	you have the prettiest face on the whole site baby	Dec 1, 2020
ewwieme	Uwu	Dec 1, 2020
Leucosticte	you make me wanna rape you	Dec 1, 2020
ewwieme	whens ur birthday?	Dec 1, 2020
Leucosticte	19 september	Dec 1, 2020
Leucosticte	I saw you're turning 13 soon	Dec 1, 2020
Leucosticte	you're so ripe and pert	Dec 1, 2020
ewwieme	Uwu	Dec 1, 2020

ewwieme	ur a vigro~	Dec 1, 2020
Leucosticte	ready for me to pluck your virginity	Dec 1, 2020
Leucosticte	babydoll do you wanna see come CP	Dec 2, 2020
ewwieme	Ooo	Dec 2, 2020
ewwieme	maybe...	Dec 2, 2020
ewwieme	i actually found my old schoolgirl outfit today,, would u be interested in seeing that? [happy face emoji]	Dec 2, 2020
Leucosticte	Hehe	Dec 2, 2020
Leucosticte	sounds interesting	Dec 2, 2020
ewwieme	i just posted schoolgirl lewds!!!	Dec 2, 2020
Leucosticte	Mmm	Dec 2, 2020
ewwieme	do u like them?	Dec 2, 2020
Leucosticte	I like your naked body parts	Dec 2, 2020
Leucosticte	somebody reported an underage nude on faerie	Dec 2, 2020
Leucosticte	how shocking	Dec 2, 2020
ewwieme	Lol	Dec 2, 2020

Leucosticte	I'm actually not sure how comfortable I am having that gallery open to the public like that	Dec 2, 2020
Leucosticte	I mean how old is that girl	Dec 2, 2020
Leucosticte	oh, 12	Dec 2, 2020
Leucosticte	by her own account	Dec 2, 2020

13. On December 21, 2020 and pursuant to California State search warrant signed by Fresno County Superior Court Judge Houry Sanderson on December 18, 2020 authorizing the search of LARSON's Samsung tablet, Samsung Galaxy cellphone, and CV's Lenovo laptop, a computer forensic analysis of the aforementioned electronic devices was performed by Fresno County District Attorney (FCDA) Senior Investigator (SI) and computer forensic examiner Derek Scott.

14. On the LARSON's Samsung tablet, video file "4_5920370567927564809" is approximately 3 minutes and 4 seconds in length that depicts a nude prepubescent female child on a bed with a nude white male adult (WMA) laying across the bed on his back. The prepubescent female child begins to grab the WMA's penis and copulates on the penis. The prepubescent female child then pulls apart her legs and

then the WMA inserts his penis into her anus. Based upon the size of the female child, based upon the lack of any development, and based upon my training and experience, the female child in this video appears to be between 7 to 8 years of age.

15. On LARSON's Samsung Galaxy cellphone, messages using the Google Hangout application dated 12/09/2020 between LARSON and "lolidoll nikko" (username provided by the CV during her interview on December 15, 2020) discussed the plans in detail of how LARSON was going to pick up the CV to travel with him back to Virginia.

16. On October 9, 2009, LARSON was convicted in the State and District of Colorado for violating Title 18 U.S.C § 871(a), Threats Against the President of the United States, and sentenced to a term of imprisonment of 16 months and 3 years supervised release.

17. Because this affidavit is written solely for the purpose of establishing probable cause for issuance of a criminal complaint, not every fact related to this investigation has been included.

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I declare under penalty of perjury under the laws of the United States that the information above in paragraphs 1-17 is true and correct.



Dada D. Cheam, Special Agent
Homeland Security Investigations

Affidavit submitted by email/.pdf and attested to me as true and accurate by telephone consistent with Fed.R.Crim.P. 4.1 and 4(d),

This 22 day of December 2020.



Honorable Barbara A. McAuliffe
United States Magistrate Judge