

AFFIDAVIT FOR ARREST WARRANT

S.A. NO.
DIVISION Special Prosecution
ASST ST ATTY Horkan

CCR NO.
JUDGE

STATE OF FLORIDA)
COUNTY OF DUVAL)

Before me the undersigned Judge of the Fourth Judicial Circuit, in and for Duval County, Florida, personally came Lt. Charles C. McMullen who, being duly sworn deposes and says that he has reason to believe and does believe that one **Bradley Robert Lamb**, described as follows: Last Known Address:**71 Holley Ridge Rd, Pittsboro, NC, 27312** Race **W**; Sex: **M**; DOB:**5/12/1956**; Ht: **5'10"**; Wt: **unk** pounds; Hair: **unk**; Eyes:**Green**; Scars, Marks:**unk**; did in Duval County, Florida, between the dates **December 5, 2005 and April 7, 2006**, commit the crime(s) **Promoting the Sexual Performance of a Child (10 counts)**, contrary to the provisions of Section(s) 827.071(3), Florida Statutes; **Lewd or Lascivious Exhibition (3counts)**, contrary to the provisions of Section(s) 800.04(7)(b)(1) Florida Statutes and **Computer Pornography-Solicitation of a Child (1count)**, contrary to the provisions of Section(s) 847.0135(3) Florida Statutes. Affiant's reasons for so believing are as follows:

Your Affiant, Lieutenant Charles C McMullen, has been assigned as a member of the Office of the Attorney General, CyberCrime Unit since its inception in August 2005. Your Affiant previously served as the Chief Investigator of the Escambia County Sheriff's Office (AL) for five years and three years prior to that as a criminal investigator with a total of 16 years as a Law Enforcement Officer. Your Affiant has attended several seminars, conferences, and schools providing training for conducting investigations of Internet crimes against children and computer crimes. Your Affiant has an understanding of the internet and has conducted investigations involving undercover chat sessions, child sexual-solicitation, and the possession and transmission of child pornography. Your Affiant has also investigated or assisted in investigations of crimes against children such as: Sexual Battery, Lewd or Lascivious Battery and Molestation, Kidnapping, Homicide, and Child Abuse.

On November 30, 2005, Your Affiant started an online undercover investigation based in the CyberCrime Unit office in Jacksonville, Duval County, Florida, posing as a 14 year old boy living in Jacksonville, Florida. Your Affiant was in a chat room hosted by Yahoo! titled "Just the Boys:11" and was using an undercover screen name. On that date, a person utilizing the screen name "jordynnc" initiated a private Yahoo! Instant Message chat session with your Affiant. During this chat session, "jordynnc" activated a web camera which showed a live video from "jordynnc." The camera showed a white male, possibly in his late thirties or early forties, wearing glasses. Also during this chat session, Your Affiant added the screen name "jordynnc" to the Yahoo! Instant Messenger buddy list. Once the screen name "jordynnc" was added to the buddy list, the name that appeared in the chat session changed to "Bradley Lamb". Your Affiant knows from training and experience that once a screen name is added into the buddy list, Yahoo! automatically imports whatever name the person entered when creating their Yahoo! Profile to get access to the Yahoo! Instant Messenger service.

Beginning November 30, 2005 through March 27, 2006, Your Affiant conducted 35 online Yahoo! Instant Message chat sessions with “Bradley Lamb” using Yahoo! Instant Messenger. Your Affiant knows through experience using Yahoo! Instant Messenger that users may trade files, including pictures, while in the chat session. During twenty of the Yahoo! Instant Message chat sessions, “Bradley Lamb” sent pictures to your Affiant. Your Affiant determined that there were images of child pornography sent from “Bradley Lamb” through the internet during ten (10) of the individual chat sessions. See ten numbered paragraphs below.

1. On December 5, 2005, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 1:22pm EST through 2:39pm EST. During this chat session “Bradley Lamb” sent a total of twenty-four (24) images. Many of the images depicted sexual conduct. Based on your Affiant’s training and experience, three (3) of the images appear to be images of child pornography and can be described as:

1. “**fab05-10**” can be described as a color picture showing what appears to be a pre-pubescent boy being fondled by another person. The boy appears to be under the age of 18 because lack of any visible pubic hair.
2. “**fab05-12**” can be described as a color picture showing what appears to be a pre-pubescent boy laying on a bed with his legs spread apart revealing his erect penis. The boy appears to be under the age of 18 because of his child sized arms and legs, lack of any visible pubic hair, and child like facial features.
3. “**fab05-18**” can be described as a color picture showing what appears to be a boy masturbating an adult male penis. The boy appears to be under the age of 18 due to his child sized arm and hand and child-like facial features.

2. On December 5, 2005, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 8:20pm EST through 9:50pm EST. During this chat session “Bradley Lamb” sent a total of twenty-six (26) images. Many of the twenty-six images appear to be images of child pornography. Four (4) specific images are documented as known images of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of “known child pornography” by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either case, a record of the image is maintained by this agency.

1. “**p1010044**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hands

and arms and child-like facial features.

2. “**p1010045**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
3. “**p1010048**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
4. “**p1010049**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.

3. On December 6, 2005, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 2:52pm EST through 4:13pm EST. During this chat session “Bradley Lamb” sent a total of thirty-four (34) images. Many of the images depicted sexual conduct. These images were submitted to the University of Florida Division of Child Protection and Forensic Pediatrics for evaluation. Dr J.M.Whitworth identified eight (8) of these images as images containing children under the age of 18. In addition to Dr. Whitworth’s evaluation of the age of the children depicted in the images, your Affiant, based on training and experience, believes that these eight pictures depict pornography with children.

1. “**spain_25**” can be described as a color picture showing three nude boys laying on a bed. The boy in the middle is masturbating both of the other boys. All three boys appear to be under the age of 18 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features.
2. “**spain_40**” can be described as a color picture showing three nude boys laying on a bed. Two of the boys are masturbating themselves while the third boy is laying on his side and appears to be kissing one of the other boys. All three boys appear to be under the age of 18 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features.
3. “**spain_65**” can be described as a color picture showing two nude boys on a bed with one boy on top of the other possibly engaged in anal sex. The boys appear to be under the age of 18 due to the child sized arms and legs and child-like facial features.
4. “**555**” can be described as a color picture showing a boy masturbating an adult male penis. The boy appears to be under the age of 18 due to his child size arm, legs and abdomen and the lack of any visible pubic hair.
5. “**557**” can be described as a color picture showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and

arm and child-like facial features.

6. “**558**” can be described as a color picture showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
7. “**560**” can be described as a color picture showing a boy holding an erect adult male penis in front of the boys mouth. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
8. “**spain_10**” can be described as a color picture showing three nude boys standing in what appears to be a large shower stall. One of the boys is bent over performing oral sex on one of the other boys. All three boys appear to be under the age of 18 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features.

4. On December 8, 2005, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 5:24pm EST through 7:06pm EST. During this chat session “Bradley Lamb” sent a total of forty-six (46) images. Based on your Affiant’s training and experience, many of those images contain images of child pornography. One (1) of the images is documented as known image of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of “known child pornography” by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either case, a record of the image is maintained by this agency.

1. “**rbv18_05**” can be described as a color picture showing an adolescent male masturbating a pre-pubescent boy while laying on a bed. The pre-pubescent boy appears to be under the age of 18 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features.

5. On December 23, 2005, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 1:26pm EST through 4:05pm EST. During this chat session “Bradley Lamb” sent a total of twenty-two (22) images. Based on your Affiant’s training and experience, many of the twenty-two images appear to be images of child pornography. The following four (4) of the images are documented as known images of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of “known child pornography” by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either

case, a record of the image is maintained by this agency.

1. “**p1010044**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
2. “**p1010045**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
3. “**p1010048**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.
4. “**p1010049**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy appears to be under the age of 18 due to his child sized hand and arm and child-like facial features.

In addition to the four files designated as “known images” of child pornography by NCMEC, the following image was viewed by Dr. J.M. Whitworth of the University of Florida Division of Child Protection and Forensic Pediatrics, identified three (3) of these pictures as images that contained images of children under the age of 18, two of which are listed above (“p101044” and “p1010049). The other one (1) file can be described as:

5. “**webfriend_2_003**” can be described as a color photograph showing a pre-pubescent boy masturbating himself while sitting on the lap of another person. The pre-pubescent boy appears to be under the age of 18 due to his child sized hand, arm, legs and child-like facial features.

Your Affiant knows from training and experience that computers using the internet identify each other by an Internet Protocol or IP address. These IP addresses assist law enforcement in finding a particular computer on the Internet. The IP address is assigned a particular Internet service company and that company can typically identify the account that uses or used the IP address to access the Internet at a particular date and time. Your Affiant was able to determine through a subpoena issued to Yahoo, Inc. of Sunnyvale, California that the Internet Protocol address that was used to access Yahoo! Instant Messenger for this chat session was 12.76.234.173. Yahoo!, Inc. also provided account Information for the user of that account “jordynnc” as follows:

Login Name: jordynnc
Alternate email address: brlnc@att.net
Name: Mr. Bradley Lamb
Address: P.O. Box 453, Pittsboro, NC 27312
Telephone: (919) 542-4827

The Yahoo Account Information also reflected that the billing and shipping address were the same as listed above. Your Affiant was able to determine that the IP address 12.76.234.173 was assigned to

AT&T Worldnet of Harrison, New York. Your Affiant was able to determine through a subpoena issued to AT&T Worldnet that the account that was assigned to 12.76.234.173 on December 23, 2005 during the time of the Yahoo! Instant Message session belonged to:

Account Name: Brad R Lamb
Address: PO Box 453, Pittsboro, NC 27312
Telephone: (919) 542-4827

The Account Usage Log Data for the account showed that the telephone number that was used to access the account for this Yahoo! Instant Message chat session was 9195424827, which is the same phone number listed on the Account Information provided by both Yahoo!, Inc. and AT&T Worldnet. Your Affiant was able to determine through an Administrative Subpoena to Sprint Mid-Atlantic Telecom issued by the North Carolina State Bureau of Investigation that the telephone number (919) 542-4827 is listed to:

Brad Lamb
71 Holly Ridge Rd
Pittsboro, NC 27312-8959

In addition to the name, address and telephone numbers all leading to Bradley Lamb, during the chat session held on December 23, 2005, "Bradley Lamb" turned on a web camera which allowed your Affiant to view a live streaming video from "Bradley Lamb" The camera showed his face and your Affiant was able to make several screen captures. Your Affiant was able to obtain a drivers license photograph from Bradley Lamb's North Carolina drivers license #5010396. Your Affiant compared the photograph of Bradley Lamb to the person that your Affiant saw during the chat session and both are of the same person. Also during this chat session, Bradley Lamb, changed the position of the camera to show his groin area and he pulled down his shorts exposing his penis and then masturbated himself, while at the time believing that your Affiant was a 14 year old boy.

6. On January 9, 2006, Your Affiant was in a Yahoo! Instant Message chat session with "Bradley Lamb" from 8:36pm EST through 10:13pm EST. During this chat session "Bradley Lamb" sent a total of fourteen (14) images. Based on your Affiant's training and experience, many of the images contain images of child pornography. Two (2) of the images are documented as known images of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of "known child pornography" by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either case, a record of the image is maintained by this agency.

1. "466229520138225145" can be described as a color picture showing what appears to be two boys under the age of 18. One of the boys is sitting on a bed and the other boy is performing

oral sex on him.

2. **"52948295RL162646066"** can be described as a color picture showing what appears to be two boys under the age of 18 with one of them laying face down with no clothing on. The other boy is kneeling on top of the first boy and is touching his anus.

Based on your Affiant's training and experience, another image that was sent during this chat session is also an image of child pornography:

3. **"44810490RL683755974"** can be described as a color photograph showing two nude pre-pubescent boys. One of the boys is sitting in a chair and has his hand on his penis with his other arm around the waist of the other boy who is kneeling next to him. Both boys appear to be under the age of 18 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features.

7. On January 15, 2006, Your Affiant was in a Yahoo! Instant Message chat session with "Bradley Lamb" from 4:57pm EST through 5:40pm EST. During this chat session "Bradley Lamb" sent a total of six (6) images. Many of those images contain images of child pornography. One (1) of the images is documented as a known image of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of "known child pornography" by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either case, a record of the image is maintained by this agency.

1. **"49846024O707559595"** can be described as a color picture showing male performing oral sex on the penis of a boy that appears to be under the age of 18.

8. On January 19, 2006, Your Affiant was in a Yahoo! Instant Message chat session with "Bradley Lamb" from 8:03pm EST through 9:22pm EST. During this chat session "Bradley Lamb" sent a total of eleven (11) images. One (1) of the images is documented as a known image of child pornography through the National Center for Missing and Exploited Children (NCMEC) database. To be identified as an image of "known child pornography" by NCMEC, either the name, age and actual identity of the child has been confirmed, or the image is one known by law enforcement to have been in circulation prior to 1985, which predates computer simulation or life-like generation of images. In either case, a record of the image is maintained by this agency.

2. **"52948295RL162646066"** can be described as a color picture showing what appears to be two boys under the age of 18 with one of them laying face down with no clothing on. The other boy is kneeling on top of the first boy and is touching his anus.

9. On February 4, 2006, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 7:16pm EST through 10:50pm EST. During this chat session “Bradley Lamb” sent a total of three (3) images. Based on your Affiant’s training and experience, one of the pictures sent contains an image of child pornography:

1. “**twoteensucked**” can be described as a color photograph showing one nude pre-pubescent boy standing while another boy is performing oral sex on him. The boy standing appears to be under the age of 13 due to the child sized arms and legs, lack of any visible pubic hair and child-like facial features. The boy performing oral sex appears to be under the age of 18 due to his child size face and child-like facial features.

During this chat session, “Bradley Lamb” also turned on a web camera which allowed your Affiant to view a live streaming video from “Bradley Lamb” The camera showed his face and your Affiant was able to make several screen captures. Your Affiant was able to obtain a drivers license photograph from Bradley Lamb’s North Carolina drivers license #5010396. Your Affiant compared the photograph of Bradley Lamb to the person that your Affiant saw during the chat session and they are of the same person. Also during this chat session, Bradley Lamb, changed the position of the camera to show his groin area and he exposed his penis and then masturbated himself while the camera was still active, while at the time believing your Affiant was a 14 year old boy.

10. On March 27, 2006, Your Affiant was in a Yahoo! Instant Message chat session with “Bradley Lamb” from 9:37pm EST through 11:22pm EST. During this chat session “Bradley Lamb” sent a total of fourteen (14) images. Based on your Affiant’s training and experience, two (2) of the pictures sent contain an image of child pornography:

1. “**51164493RL067123504**” can be described as a color photograph showing a boy performing oral sex on an adult male penis. The boy performing oral sex appears to be under the age of 18 due to his child size arms, hand and leg and child-like facial features.
2. “**hotboys028(1)**” can be described as a color photograph showing an adolescent boy sitting on a chair masturbating himself. The boy appears to be under the age of 18 due to his small arms, torso and legs and child-like facial features.

During this chat session “Bradley Lamb” solicited Your Affiant, who was posing as a fourteen (14) year old boy for the purpose of performing oral sex on me. Also during this chat session, “Bradley Lamb” also turned on a web camera which allowed your Affiant to view a live streaming video from “Bradley Lamb” The camera showed his face and your Affiant was able to make several screen captures. Your Affiant was able to obtain a drivers license photograph from Bradley Lamb’s North Carolina drivers license #5010396. Your Affiant compared the photograph of Bradley Lamb to the person that your Affiant saw during the chat session and believes they are of the same person. Also during this chat

session changed the position of the camera to show his groin area and he pulled down his shorts exposing his penis and then masturbated himself while the camera was still active, while at the time believing your Affiant was a 14 year old boy.

Affiant, Lt. Charles C McMullen
Office of the Attorney General
CyberCrime Unit

Sworn to and subscribed before me this _____ day of April, 2006, by the aforementioned Affiant [] who is personally known to me or [] who has produced _____ as identification and who did take an oath.

Judge of the Circuit / County Court of the Fourth
Judicial Circuit in and for Duval County, Florida

ARREST WARRANT

S.A. NO.
DIVISION Special Prosecution
ASST ST ATTY Horkan

CCR NO.
JUDGE

IN THE NAME OF THE STATE OF FLORIDA
TO ALL SINGULAR THE SHERIFFS OR DEPUTY
SHERIFFS OF THE STATE OF FLORIDA

WHEREAS, upon the sworn affidavit, complaint or other sworn testimony of Det. K.M. Jones #6814, the undersigned Judge of the Fourth Judicial Circuit of Florida, in and for Duval County, has found that there exists probable cause to believe that one **Bradley Robert Lamb** did, between the dates December 5, 2005 and April 7, 2006, in Duval County, Florida, commit the offense(s) **Promoting the Sexual Performance of a Child (10 counts)**, contrary to the provisions of Section(s) 827.071(3), Florida Statutes, **Lewd or Lascivious Exhibition (3counts)**, contrary to the provisions of Section(s) 800.04(7)(b)(1) Florida Statutes and **Computer Pornography-Solicitation of a Child (1count)**, contrary to the provisions of Section(s) 847.0135(3) Florida Statutes. You are HEREBY COMMANDED to arrest **Bradley Robert Lamb**; Last Known Address: **71 Holley Ridge Rd, Pittsboro, NC, 27312.**; Race: **W**; Sex: **M** ; DOB: **5/12/1956**; Ht: **5'10"**; Wt: **unk**; Hair: **unk**; Eyes: **Green**; Scars, Marks: **unk**; if be found in your county, and safely keep **Bradley Robert Lamb** so that you have **his** body before a Judge of the Duval County Circuit Court, at the Courthouse in Jacksonville, instanter, to be dealt with according to law. Appearance bond is fixed at \$_____.

Given under my hand and seal this _____ day of April, 2006.

Judge of the Circuit / County Court of the Fourth
Judicial Circuit in and for Duval County, Florida

Enter in NCIC or FCIC: Yes No (CHECK ONE)
If YES, Extradition Code: C/E/O/S/D (CIRCLE ONE)
ASA Approval: HORKAN

Received this Arrest Warrant the _____ day of _____, 20____, and executed it on the _____ day of _____, 20____, by arresting the within named _____ and having him / her now before the Court this _____ day of _____, 20____.

Arresting Officer: _____ ID #____
Agency: _____
Duty Section: _____

JAIL DOCKET NO. _____