

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHANEY O'CONNOR,

Defendant.

No. 3:24-mj-00686-KFR

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Krista Lang, having been first duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI).
2. I make this affidavit in support of an application for a criminal complaint and arrest warrant pursuant to Federal Rules of Criminal Procedure 3 and 4. As explained more fully below, I have probable cause to believe that Anthaney O'Connor (O'CONNOR) has committed the following federal criminal offenses:

**Count 1:** That on or about August 14, 2024, within the District of Alaska, at or near Anchorage, the defendant, ANTHANEY O'CONNOR, knowingly received any child pornography, as defined in 18 U.S.C. § 2256(8)(A), and any material containing child pornography, using a means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.



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**Count 2:** That on or about August 14, 2024, within the District of Alaska, at or near Anchorage, the defendant, ANTHANEY O’CONNOR, knowingly distributed and attempted to distribute any child pornography, as defined in 18 U.S.C. § 2256(8)(A), and any material containing child pornography, using a means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**Count 3:** That on or about August 14, 2024, within the District of Alaska, at or near Anchorage, the defendant, ANTHANEY O’CONNOR, knowingly possessed material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A), (C), which had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**Count 4:** That on or about December 19, 2024, within the District of Alaska, at or near Anchorage, the defendant, ANTHANEY O’CONNOR, knowingly possessed material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A), (C), which had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.



3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because the affidavit is intended to establish probable cause to support a complaint and secure an arrest warrant, I have not included each and every fact known to me concerning this investigation.

### **FACTS ESTABLISHING PROBABLE CAUSE**

4. On 08/13/2024 law enforcement received information from O'CONNOR concerning another individual, an airman, who O'CONNOR alleged wanted to commit sexual assaults against minors. O'CONNOR stated the airman shared with him child sexual abuse material (CSAM) via text messages and links from APPLICATION A,<sup>1</sup> an internet-based chat application known to law enforcement to be utilized by individuals seeking sexually explicit materials portraying minors, during August 2024. O'CONNOR also indicated he maintains an active APPLICATION A account.

5. On 8/13/2024 in response to O'CONNOR's statement about the airman, law enforcement asked for the subject to share screenshots of the texts where the airman admitted to wanting to sexually assault children or watching child pornography. O'CONNOR sent screenshots of the text messages to law enforcement and also sent two images of CSAM to the duty phone of a law enforcement special agent, in August 2024. A review of the screenshots of the text message between O'CONNOR and the airman

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<sup>1</sup> The name of Application A is known to law enforcement but anonymized in this affidavit to protect operational security. Application A remains active and disclosure of the name of the application would potentially alert its users to the fact that law enforcement action is being taken against users of the application, thereby provoking users to notify other users of law enforcement action, flee, and/or destroy evidence. Accordingly, to protect the confidentiality and integrity of the ongoing investigation involved in this matter, the application will be identified herein as "Application A".



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showed the airman telling O'CONNOR that while he was being anally penetrated once, he surreptitiously watched "cheese pizza" to orgasm. The term cheese pizza is referring to child pornography and is known by your affiant to be commonly used by individuals seeking sexually explicit material depicting minors.

6. On 8/13/2024 O'CONNOR consented to law enforcement searching his cellular telephone and law enforcement completed a full extraction of that phone.

7. During a review of O'CONNOR's phone, law enforcement reviewed the text messages sent between O'CONNOR and the airman and discovered the airman sent two images of CSAM to O'CONNOR that O'CONNOR possessed on his phone in August 2024.

The two images are described as follows:

a. One image depicted a naked grown man laying down with a large erect penis. Lying on top of the man is a naked young boy whose age seemed approximately five to seven years old.

b. The second image depicted the upper part of a shirtless young boy, whose age seemed approximately five to seven years old, who had his face near what appeared to be a grown man's testicles and erect penis.

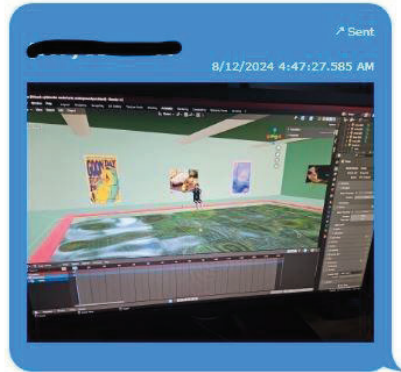
8. Prior to reporting to law enforcement, O'CONNOR sent a text message to the airman on August 12, 2024, with images of a virtual reality world he was creating on his computer. O'CONNOR indicated that he could make CSAM "VR POV" material from the pictures the airman surreptitiously takes of young boys in the local community. VR POV stands for virtual reality point of view, meaning it refers to a perspective in a virtual reality environment where you see the scene as if you were directly experiencing it yourself. O'CONNOR's messages are depicted in blue below:



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8/12/2024 4:47:05.005 AM  
Lol no yeah people make vr PoV stuff all the time plus i can make my own models



8/12/2024 4:47:44.110 AM  
Im working on my pool~ 3d virtual space

9. O’CONNOR further stated he is not into real children, just drawings depicting child sexual abuse material. O’CONNOR’s messages are depicted in blue below:

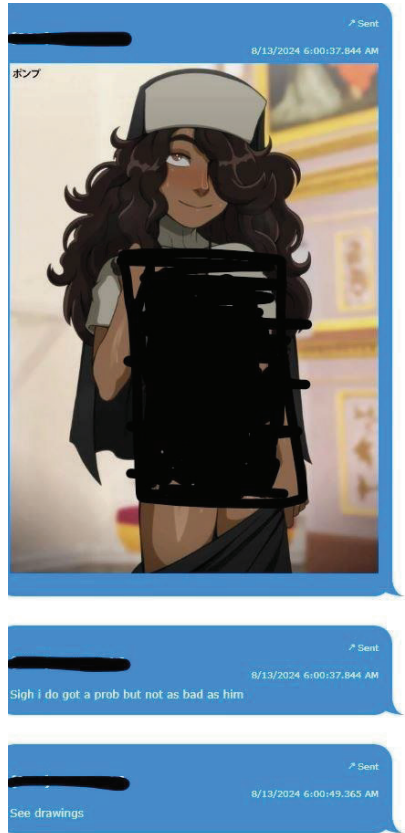
8/13/2024 4:15:41.076 AM  
Cant even tell someone youve porked love them

8/13/2024 4:16:11.192 AM  
Cheese pizza and a user im sure youd be executed on the spot

8/13/2024 4:18:30.904 AM  
Adleast my shit is drawings you take pics of real children

10. Furthermore on 8/13/2024 O’CONNOR stated to another individual he had a problem, but not as bad as the airman, because he was only into “drawings.” O’CONNOR then sent a cartoon image to another individual of a female with her breast

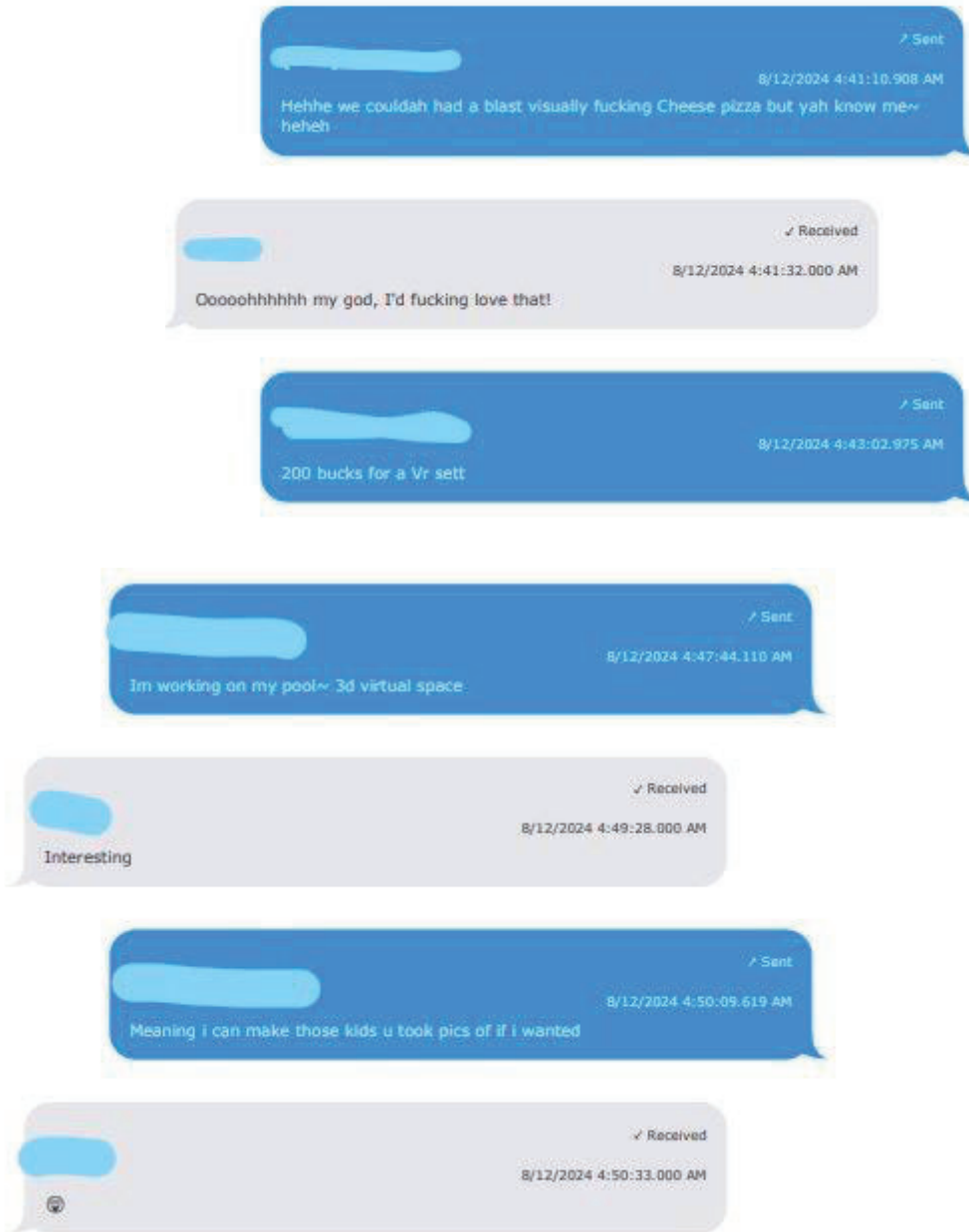
partially exposed, wearing thong underwear and buttocks partially exposed. O'CONNOR's messages are depicted in blue below with redactions on the image:



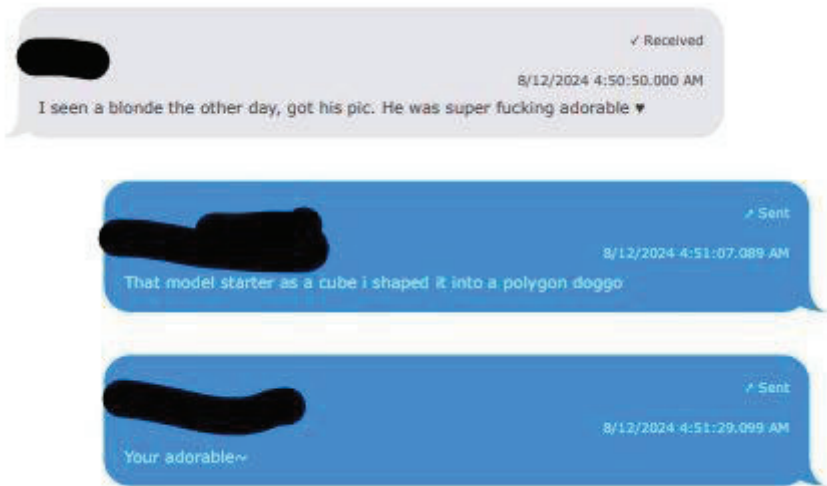
11. On 11/1/2024 law enforcement met Anchorage FBI to advise of the ongoing case. Law enforcement provided a full extraction of O'CONNOR's phone. A review of the phone portrayed text messages between O'CONNOR and the airman. The airman sent a picture of a fully clothed prepubescent boy sitting in a grocery cart in Costco. The airman had surreptitiously taken the photo and sent it to O'CONNOR with the caption "I seen a blonde the other day, got his picture. He was super fucking adorable." O'CONNOR and the airman discussed how they could use the photos the individual takes of children in a virtual reality setting where they could create CSAM.

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12. Messages between the O'CONNOR (in blue) and the airman (in grey) are depicted below:



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13. Further review of O'CONNOR's phone revealed additional CSAM material that O'CONNOR did not previously disclose to law enforcement. During the extraction 3 JPG were recovered as carved. Carved JPG refers to a technique called "file carving" in digital forensics, where the data is recovered directly from the raw bytes on the disk without relying on the file system metadata, typically used to find deleted or hidden images that might not be visible through normal means. O'CONNOR's phone contained approximately 6 artificial intelligence (AI)/ Cartoon drawings/images depicting CSAM, 4 CSAM images and 2 videos containing CSAM.

a. One of the CSAM videos O'CONNOR possessed and received from the airman via an APPLICATION A link in August 2024 was approximately 57 seconds in length and depicted various folders consistent with known CSAM labels. CSAM is briefly displayed throughout the video. Names of the folders containing visible CSAM included rape, CP, teens, deep web pedo, SnapChat girls, young girls alone and incest.

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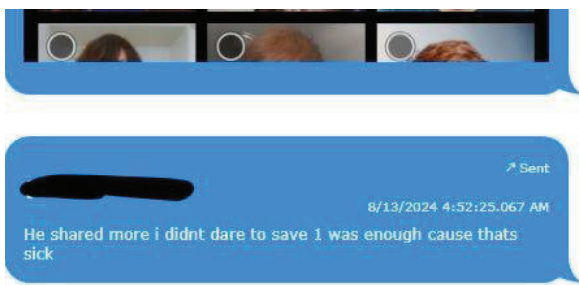
b. Another CSAM video O'CONNOR possessed on his phone was approximately 25 seconds in length and depicted two prepubescent males, naked, performing manual sex on one another.

c. The four images O'CONNOR possessed on his phone displaying CSAM appear to be still images from a CSAM video and depicted two prepubescent males naked with their penises visible and performing manual sex on one another.

d. A review of the AI CSAM O'CONNOR possessed on his phone included but not limited to: a naked toddler with adult male penis ejaculating on toddler's back, a prepubescent female with adult male penis in mouth and a prepubescent naked female with vagina exposed.

O'CONNOR only disclosed two images and 1 video during his interview with law enforcement, however, as detailed above, more was discovered.

14. On 8/13/2024 O'CONNOR stated to a another individual that the airman had shared more images, but he dared not save, however based on the review completed at that time of O'CONNOR's phone it is apparent additional images were retained. Pictured below are messages sent in blue by the O'CONNOR to another indivual and contain a gallery of non CSAM photos the individual had sent to O'CONNOR.



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15. On 12/19/2024 FBI Anchorage executed a federal search warrant, 3:24-mj-00684-KFR, at O'CONNOR's residence.

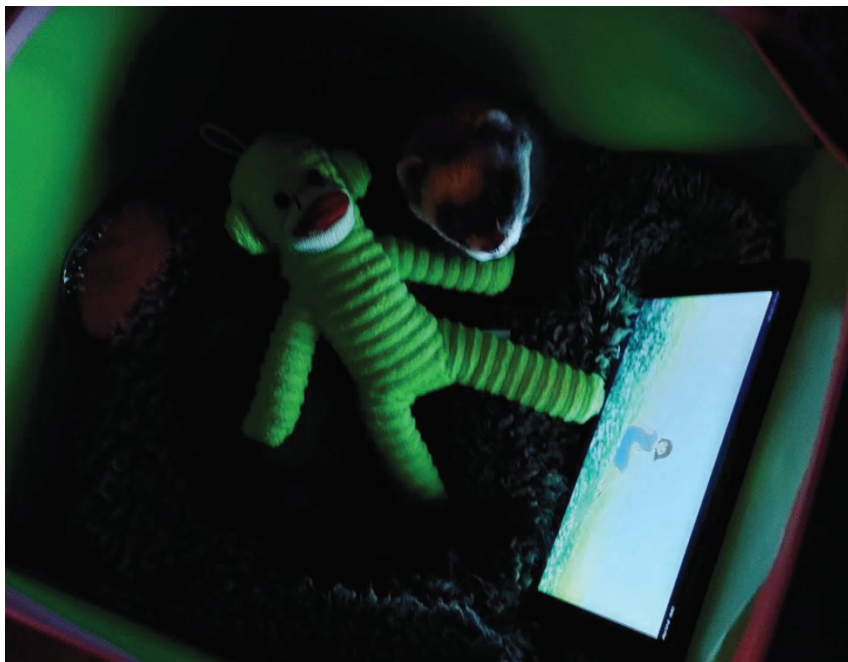
16. A limited manual review of O'CONNOR's computer was conducted on scene and revealed O'CONNOR was in possession of a CSAM video approximately 41 seconds in length and depicted an adult male having anal sex with a prepubescent boy. An additional CSAM image was reviewed on his computer and appeared to resolve back to APPLICATION A links. That image depicts a nude adult female between the legs of a prepubescent girl, who is nude from the waist down. The link is named "Teen [unreadable] ages 5-17." Also revealed were several AI images/anime clearly showing prepubescent children depicted in child sexual abuse material.

17. On 12/19/2024, O'CONNOR consented to an interview, during the interview O'CONNOR stated he mainly downloaded AI generated CSAM images but claimed he unintentionally downloaded "real" CSAM sometimes, however O'CONNOR admitted to coming back to these images for sexual gratification time and time again. O'CONNOR claimed he would report the live CSAM to the ISP providers, but still was sexually gratified from the images and or videos. O'CONNOR provided he downloaded CSAM and would distribute it via texts with friends. O'CONNOR downloaded CSAM as recently as 12/18/2024.

18. The search on 12/18/24 of O'CONNOR's residence revealed that O'CONNOR hid two electronic storage devices and a computer hard drive in the vents of his bedroom closet. In addition to the hidden electronics, multiple phones and computer drives were found within O'CONNOR's bedroom. The contents of these items have not yet been reviewed



but are pending review. The below image appears to depict one of the possible devices found during the search:



19. At this point, the FBI was authorized by the U.S. Attorney's Office to conduct a probable cause arrest of the SUBJECT for violations of 18 U.S.C. § 2252A(a)(2) (Receipt of Child Pornography); 18 U.S.C. § 2252A(a)(2) (Distribution of Child Pornography); and 18 U.S.C. § 2252A(a)(5) (Possession of Child Pornography).

#### **SUMMARY OF PROBABLE CAUSE**

20. Based upon the information above, specifically:
- a. Review of O'CONNOR's phone and phone extraction which revealed videos and images of CSAM he possessed, including AI-generated CSAM, in August 2024;
  - b. CSAM videos and images that O'CONNOR received from the airman in August 2024;


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- c. CSAM images O'CONNOR distributed to law enforcement in August 2024;
- d. CSAM images and videos downloaded and possessed on O'CONNOR's computer on December 19, 2024;
- e. O'CONNOR's admissions on December 19, 2024, of possessing, downloading, receiving, and distributing CSAM,

Your affiant submits that there is probable cause to believe that O'CONNOR committed the offenses described in the attached Complaint, specifically that O'CONNOR violated 18 U.S.C. § 2252A(a)(5) (Possession of Child Pornography) and 18 U.S.C. § 2252A(a)(2) (Receipt and Distribution of Child Pornography) on or about August 14, 2024 and December 19, 2024.

21. Accordingly, I ask the Court to issue the complaint and a warrant for Anthaney O'Connor's arrest in accordance with Federal Rule of Criminal Procedure 4(a).

RESPECTFULLY SUBMITTED,

  
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KRISTA LANG  
Special Agent  
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) on this day of \_\_\_\_\_, 2024.

  
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HON. KYRLE BEARDON  
United States Magistrate Judge  
District of Alaska  
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