

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

ROBERT DUNN, and  
TONYA BAGLEY

Defendant(s)

Case No. 20-MJ-8141-BPT

FILED BY TW D.C.  
MAR 19 2020  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.P.B.

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 November 19 - 21, 2019 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a)	Conspiracy to Commit Production of Child Pornography
18 U.S.C. § 2251(a)	Production of Child Pornography (as to DUNN only)
18 U.S.C. § 2260A	Felony Involving a Minor Committed by a Sex Offender (as to DUNN only)
18 U.S.C. § 2425	Use of Interstate Facilities to Transmit Information about a Minor (as to BAGLEY only)

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

*Scott Wilson*  
Complainant's signature

FBI Special Agent Scott Wilson  
Printed name and title

Attested to me pursuant to  
Fed. R. Criminal. P. 4.1 by telephone

Sworn to before me and signed in my presence.

Date: 3/18/20

*Bruce Reinhart*  
Judge's signature

City and state: West Palm Beach, Florida

Bruce Reinhart, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

I, Scott Wilson, an agent with the Federal Bureau of Investigation (FBI) being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since 2002. I am currently assigned to the Miami Field Office, Palm Beach County Resident Agency, PB-2 squad, which investigates all manners of violent crimes including the online sexual exploitation of children. As part of my duties, I investigate crimes involving the sexual exploitation of minors including the production, possession and distribution of child pornography. I received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in several child exploitation investigations and have executed search warrants that have led to seizures of child pornography. I have initiated and participated in numerous investigations resulting in the arrest and conviction of individuals involved in the possession, distribution, and production of child pornography. As a result of my experience, I have learned the following information in my official capacity, by firsthand observations, as well as by receiving information from federal and local law enforcement, about the investigation of Robert DUNN (hereinafter "DUNN") and Tonya BAGLEY (hereinafter "BAGLEY").

2. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request an arrest warrant. This affidavit is submitted in support of an arrest warrant for DUNN and BAGLEY.

3. The information in this affidavit is based upon my personal knowledge, as well as information learned from other law-enforcement agents, investigators, witnesses, and documents. This affidavit is submitted for the limited purpose of establishing probable cause in support of an arrest warrant; as such, it does not include each and every fact known to the government about this investigation.

4. Based on the information set forth in this affidavit, there is probable cause that DUNN and BAGLEY have committed violations of 18 U.S.C. § 2251(a) (conspiracy to commit production of child pornography); that Dunn has committed violations of 18 U.S.C. § 2251(a) (production of child pornography) and violations of 18 U.S.C. § 2260A (felony involving a minor committed by a sex offender); and that BAGLEY has committed violations of 18 U.S.C. § 2425 (use of interstate facilities to transmit information about a minor). I am requesting authority to arrest DUNN and BAGLEY for such violations.

**PROBABLE CAUSE**

5. In September 2019, FBI and Task Force Agents from Sarasota County, within the Middle District of Florida, began a child pornography investigation in response to National Center of Missing and Exploited Children (NCMEC) Cybertips in regards to Google accounts belonging to DUNN while he lived in the Middle District of Florida and then in Lake Worth, in the Southern District of Florida. The Cybertips involved the possession of child pornography. A search warrant for DUNN's Lake Worth residence was executed on March 10, 2020.

6. On March 10, 2020, an FBI Task Force Agent obtained a Criminal Complaint, having arrested DUNN at this Lake Worth residence for possession and receipt of child pornography, from the United States District Court for the Southern District of Florida, Case Number: 20-MJ-8122-WM. The Affidavit in support of the Complaint is incorporated by

reference herein. The facts alleged in the Affidavit, incorporated herein, establish the factual basis for probable cause to have arrested DUNN. DUNN is a registered sex offender in the State of Florida, having been directed to register as a result of his conviction on February 20, 2014 in Manatee County, Florida, case number 2013CF001032A, for traveling to meet a parent to solicit/entice a child to commit a sex act, in violation of F.S.S. § 847.0135(4)(b), and attempted lewd or lascivious battery (victim 12 or older, less than 16) , in violation of F.S.S. § 800.04(4)(a) and 777.04.

7. DUNN provided a statement to law enforcement. During said statement, he provided that he had been in communication with a female named “Tonya” whom he believed to be in Colorado thru the social media application, Facebook Messenger. “Tonya” told him that she had children, including specifically a 6-year-old boy. He asked “Tonya” to produce an image of her performing oral sex on the 6-year-old boy and send him the picture. DUNN admitted that she did in fact produce the child pornography image at his request, and sent it to him through Facebook Messenger, which he then used to see the image. He admitted that she sent three such images of child pornography that he viewed through Facebook Messenger. He then admitted that he had gone to Western Union in Palm Beach County and sent “Tonya” money to help her move to Florida to live with him. He admitted that he understood that “Tonya” would move to South Florida, with her children to follow. During their relationship in which he was the master and “Tonya” was the slave, the child would be in the home. During the course of the search of DUNN’s aforementioned Apple iPhone, the installed Facebook Messenger application was found inside the phone and a Facebook contact for “Tonya” in Colorado was also found.

8. An examination of DUNN’s rose-gold colored iPhone 6S, found in his possession revealed that DUNN had and used a Google Hangout account named “Robert Dunn” with email

address nudistmale7975@gmail.com. The account's profile picture is a photo of DUNN. One of his contacts is "Tonya Slave". "Tonya Slave" has been positively identified through publicly available websites and DUNN's phone as BAGLEY from Colorado. There are several messages between DUNN and BAGLEY from February 21, 2020 through March 2, 2020. On February 22, 2020, BAGLEY stated that she was in the hospital. DUNN asked why she was avoiding him and said that he observed that she had been on Facebook recently. BAGLEY stated she was not on Facebook and DUNN replied, "But your one name Tonya Bagley has been posting stuff to Samantha". BAGLEY replied, "Oh the other account? Yeah not me. lol. That's an account a friend set up to make it look like I was active and stuff for my nosy ex". DUNN replied, "I didn't know. I found 3 accounts total for you". "Tonya Slave" responded, "Yeah one is from years ago for gaming so I didn't spam all my friends". BAGLEY later told DUNN that she was in the hospital and dying of breast cancer.

9. Based upon this information as well as the child pornography found on DUNN's devices, a search warrant was obtained from the United States District Court for the Southern District of Florida, Case Number: 20-MJ-8125-WM for DUNN and BAGLEY's Facebook accounts on March 13, 2020. The Affidavit in support of the Search Warrant is incorporated by reference herein. The facts alleged in the Affidavit, incorporated herein, establish the factual basis for probable cause to have acquired the contents of DUNN and BAGLEY's Facebook accounts.

10. On March 16, 2020, your Affiant was able to access the Facebook response with the contents, communications, and photographs within those accounts, and specifically an instant message conversation between DUNN's Facebook account (ID# 1000256336351) and BAGLEY's Facebook account (ID# 1048088014); the contents of which are summarized as follows.

11. In a Facebook instant message conversation exchanged between BAGLEY and DUNN from November 19 – 21, 2019, BAGLEY identified herself admitting she lived (at the time) in Kremmling, Colorado with her two sons, and that they will be homeless after November 23. Publicly available database information provided a previous address for BAGLEY in Kremmling, Colorado in 2019. BAGLEY admitted she was 41 years old and employed by Federal Express. BAGLEY messaged that she was always naked, including around her sons, unless she went outside. She messaged that her sons were schooled online from home. BAGLEY messaged, and it has been confirmed, that she has two sons, aged 6 and 12. BAGLEY provided her son's true names and that her youngest son is not circumcised. BAGLEY also messaged, and it has been confirmed, that she has an 18-year-old daughter who is a firefighter.

12. DUNN, for his part of the conversation said he used to live on the west coast of Florida and was then living in Lake Worth, Florida. This has been confirmed through the sex offender records of DUNN. DUNN messaged that BAGLEY and DUNN's ex-wife both have the same first name: Tonya. This has been confirmed as well.

13. BAGLEY and DUNN messaged extensively about the two having a dominant, submissive relationship in which DUNN would be the master and BAGLEY the slave. DUNN messaged BAGLEY that he wanted her to move to Florida to be his slave. He asked if she would bring both of her sons; BAGLEY responded in the affirmative. BAGLEY further suggested that her 18-year-old daughter could be a surrogate for the love child of DUNN and BAGLEY. DUNN repeatedly requested of BAGLEY, who willingly agreed, that upon living together, BAGLEY would always be naked and performing oral sex on DUNN unless he directed her otherwise. They both agreed that if the children were present during this, that it would be ok. DUNN and BAGLEY

agreed that the children would live nude as well. They both further agreed that watching pornography in front of the children would be appropriate.

14. During a series of messages, BAGLEY discussed her youngest son having an erection, looking at her vagina, and on one occasion, touching her face with his penis while she was sleeping. DUNN responded how this turned him on. DUNN inquired about BAGLEY giving the child oral sex; BAGLEY responded that the child told him to put his penis in her mouth. When DUNN asked if BAGLEY would consider this wrong behavior on her part, BAGLEY responded she would consider it if the boy was older. BAGLEY confirmed that her youngest son was not circumcised, but the other child was.

15. DUNN messaged how the legal age of adulthood was not correct in his mind and that adulthood begins when a child reaches puberty, regardless of the age. BAGLEY did not object to this proposition.

16. DUNN messaged a "contract" to BAGLEY which outlined rules that the master and slave agree to. DUNN sent the rules one at a time and requested that BAGLEY send a nude photograph of herself every time she agreed to a rule. In acknowledging her agreement to rule one, titled law of respect/communication, BAGLEY sent a nude photograph of herself lying on her back in a bed with her legs spread, exposing her vagina. In acknowledging her agreement to rule two, titled law of rights and privileges, BAGLEY sent a nude photograph of herself lying on her side in a bed. In acknowledging her agreement to rule three, titled the law of nudity, BAGLEY sent a nude photograph of herself lying on her stomach in a bed with her legs spread exposing her vagina. In acknowledging her agreement to rule four, titled The Law of being Sexually Pleasing, BAGLEY sent a nude photograph of herself lying on her back in a bed with her legs up in the air exposing her vagina. Rule four included, among other things, BAGLEY's acceptance that "...she

will do everything within her power to convince her sons not to rat her out for any reasons that she may perform oral sex upon them or give them hand jobs when [DUNN] request[s] if of her.” In acknowledging her agreement to rule five, titled law of being a human toilet, BAGLEY sent a nude photograph of herself sitting on a bed. In acknowledging her agreement to rule seven, titled law of additional slaves, BAGLEY sent a nude photograph of herself sitting on a bed with her breasts exposed. In acknowledging her agreement to rule eight, titled law of attentiveness and posing, BAGLEY sent a nude photograph of herself lying on her stomach on a bed with her vagina exposed. In acknowledging her agreement to rule nine, titled law of being thankful, BAGLEY sent a nude photograph of herself lying on her back in a bed with her legs spread exposing her vagina. In acknowledging her agreement to rule ten, titled law of time accrument for privileges, BAGLEY sent a photograph of her face wherein in she is attempting to touch her nipple with her tongue. DUNN messaged BAGLEY inquiring who took each of the aforementioned photographs, to which BAGLEY stated her youngest son.

17. After the rules were established and agreed to by both DUNN and BAGLEY, DUNN messaged BAGLEY to “suck XXXXX’s dick when you put him to bed tonight.”<sup>1</sup> DUNN then requested that BAGLEY take a photograph of her on her knees with her youngest son’s penis by her face. She responded, “Yes Master. Thank you”. BAGLEY sent a photograph and apologized saying that her son took the photograph and it was all hair. The photograph was in fact only that of an adult female’s hair, which matched BAGLEY’s hair from the previous pictures she had sent. DUNN requested that she retake the photograph.

18. BAGLEY then sent a photograph of what appears to be a child’s torso and hand. The child is wearing a pair of blue pajamas and is pulling them down a bit at the crotch. There is

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<sup>1</sup> As this complaint is public record, the name of the 6-year old child has been redacted.



blonde hair of a person near the child's crotch. BAGLEY messaged that her son had the pajamas on because he was cold. Several times during the 3-days of messages, BAGLEY reminded DUNN that the temperature was below freezing in Colorado. She stated she was going to get him to remove the pajamas. DUNN then stated, "Good. see to it that he wears nothing and retake the photo but let me see your face more and just the head of his dick in your mouth. I want to see full skin here and no clothing in the way." BAGLEY responded, "Yes Master" and "Master permission to wait. Their father just showed up unannounced." DUNN later messaged about the photographs, "When you are available to talk just send me a full body pic of both you and XXXXX<sup>2</sup> completely naked sitting next to each other so I know you're done. I don't want to see one shred of clothing on any one of you." BAGLEY, in the course of the messages, advised she and her husband were separated and that both young children live with her.

19. A few hours later, BAGLEY sent a photograph of her and her son, in which BAGLEY's face is visible, down to her upper breast area. She appears to be shirtless. Her son's face is visible down to his torso area. He is shirtless and appears to be naked, his genitals are not in the frame. DUNN then stated, "Now that XXXXX is naked with you I want to see a couple pics, one with his dick inside your mouth and the other you touching the head of his dick with your tongue". In response, BAGLEY sent a photograph of her face in view and her tongue touching the tip of a young boy's uncircumcised penis. The boy's hand is in view. DUNN asked if XXXXX liked it. BAGLEY responded, "He says it's weird". DUNN responded, "lol" and "Alright now a pic with it all the way in your mouth". The next exchange was a photograph of BAGLEY's face and her lips around the same boy's penis. A child's hand is in view. DUNN responded, "Good slave" to which BAGBLEY messaged, "Thank you Master," after this last picture was sent.

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<sup>2</sup> As this complaint is public record, the name of the 6-year old child has been redacted.

DUNN then inquired about BAGLEY's older son being involved and BAGLEY responded that he was refusing to leave his room.

20. In a later exchange about producing similar videos to the photographs, DUNN stated, "...don't make and send those videos until I tell you too. Let's be smart and not use Facebook in case of monitoring. I created you a gmail account that you'll use under the app of Hangouts so download hangouts on your phone and then login using mastersslave\*\*\*\*\*@gmail.com with password ##### and look for me in hangouts which you should find easily under nudistmale\*\*\*\*\*@gmail.com".<sup>3</sup>

21. During the course of these communications and messages, DUNN was in Lake Worth Florida where he is registered as sex offender. All of BAGLEY's messages were sent to DUNN in Lake Worth, Florida. Multiple photographs that DUNN sent to BAGLEY during the three-day messaging are of himself in his home yard, identical to DUNN's yard identified when he was arrested on child pornography related charges on March 10, 2020.

22. Grand County Sheriff's Office (GCSO) investigators in Colorado have identified BAGLEY, date of birth 3/##/1978, as living with her two (2) sons at Winter Park Properties, 81699 US Hwy 40, Apt. 709, Parshall, CO 80468 as of March 18, 2020. GCSO investigators further confirmed with the apartment manager at BAGLEY's residence that BAGLEY is fact living in apartment 709.

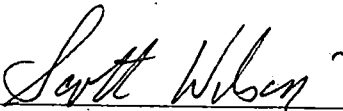
### CONCLUSION

23. Based upon the information provided above, I respectfully submit that probable cause exists that DUNN and BAGLEY have committed violations of 18 U.S.C. § 2251(a) (conspiracy to commit production of child pornography); that DUNN has committed violations of

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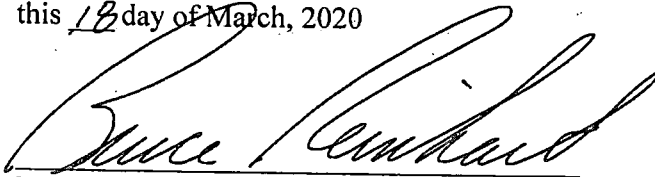
<sup>3</sup> As this complaint is public record, the email identifiers have been redacted.

18 U.S.C. § 2251(a) (production of child pornography) and violations of 18 U.S.C. § 2260A (felony involving a minor committed by a sex offender); and that BAGLEY has committed violations of 18 U.S.C. § 2425 (use of interstate facilities to transmit information about a minor). I therefore respectfully request that an arrest warrant be issued authorizing the arrest of DUNN and BAGLEY for such violations.

  
\_\_\_\_\_  
Scott Wilson  
Special Agent  
Federal Bureau of Investigation

Attested to me pursuant to  
Fed. R. Criminal. P. 4.1 by telephone

~~Subscribed and sworn to before me~~  
this 18 day of March, 2020

  
\_\_\_\_\_  
BRUCE E. REINHART  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROBERT DUNN

Case No: 20-MJ-8141-BER

Count #: 1

Conspiracy to Commit Production of Child Pornography

Title 18, United States Code, Section 2251(a)

\*Max. Penalty: 30 Years' Imprisonment (15 year minimum mandatory), \$250,000 fine, Supervised Release of 5 Years to Life, \$5000 Special Assessment, \$100 Assessment, Restitution

Count #: 2

Production of Child Pornography

Title 18, United States Code, Section 2251(a) and (e)

\*Max. Penalty: 50 Years' Imprisonment (25 year minimum mandatory), \$250,000 fine, Supervised Release of 5 Years to Life, \$5000 Special Assessment, \$100 Assessment, Restitution

Count #: 3

Felony Involving a Minor Committed by a Sex Offender

Title 18, United States Code, Section 2260A

\*Max. Penalty: 10 Years' Imprisonment consecutive to any other sentence.

**\*Refers only to possible term of incarceration, fines, special assessments, does not include possible restitution, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Tonya Bagley

Case No: 20-MJ-8141-BER

Count #: 1

Conspiracy to Commit Production of Child Pornography

Title 18, United States Code, Section 2251(a)

\*Max. Penalty: 30 Years' Imprisonment (15 year minimum mandatory), \$250,000 fine, Supervised Release of 5 Years to Life, \$5000 Special Assessment, \$100 Assessment, Restitution

Count #: 2

Use of Interstate Facilities to Transmit Information about a Minor

Title 18, United States Code, Section 2425

\*Max. Penalty: 5 Years' Imprisonment, \$250,000 fine, Supervised Release of up to 3 Years, \$100 Assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

No. 20-MJ-8141-BER

UNITED STATES OF AMERICA

V.

ROBERT DUNN, and

TANYA BAGLEY

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**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003?  Yes  No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007?  Yes  No

Respectfully Submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

By: /s/ Gregory Schiller  
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