

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Preston M. Hoke, having been duly sworn, state;

Identity of Law Enforcement Officer Making Request

1. I am a Special Agent with the Federal Bureau of Investigation and have been since January of 2021. I received approximately 21 weeks of training at the FBI Academy in Quantico, Virginia. During that time, I received training on various subjects including evidence collection, interviewing, legal procedure and process, source management, investigative technology, firearms and tactical training, and defensive tactics. I am currently assigned to the Violent Crimes squad, assigned to work violent incident crimes, of the FBI's Louisville Field Division. I am responsible for investigating, among other things, violations concerning robbery, carjacking, kidnapping, firearms act violations, fugitives from justice, child exploitation, and human trafficking cases. Before my current assignment, I was a police officer in Mesquite, Texas where I responded to and investigated state and municipal crimes, both in progress and delayed. I received approximately 44 weeks of training in the police academy and on-the-job field training where I learned similar skills outlined above in the FBI academy. I conducted on scene investigations of numerous natures of criminal offenses including but not limited to, assault, individual and commercial robberies, narcotics violations, firearms violations, fugitives from justice, sexual assaults, child abuse, among other things.
2. This affidavit is submitted in support of a criminal complaint alleging that JONATHON

CHASE VOWELS-HARPER violated Title 18, United States Code, Sections 2422(b), 2251(a), 2252A(a)(2). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging VOWELS-HARPER with Enticement in violation of 18 U.S.C. §2422(b), Using a Minor to Engage in Sexually Explicit Conduct to Produce a Visual Depiction in violation of 18 U.S.C. §2251(a), and receipt of child pornography in violation of 18 U.S.C. §2252A(a)(2), I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

Facts Establishing Probable Cause

3. On June 23, 2021, 12-year-old MINOR VICTIM was forensically interviewed in London, Kentucky about a separate child exploitation case. At the end of the interview, MINOR VICTIM disclosed being in contact with another subject on the SnapChat application, who she referred to as “Chase”. MINOR VICTIM described the subject as a 21-year-old male with blue/green eyes from Louisville, Kentucky who may also work for UPS or Fed-Ex.
4. MINOR VICTIM told the subject she was 13 years old. The subject asked MINOR VICTIM to send him photographs and videos of herself that were sexual in nature, which MINOR VICTIM did. MINOR VICTIM and the subject also discussed meeting in person to engage in sexual activity and MINOR VICTIM sent the subject her home address at the time.
5. After the interview, FBI OCE-10127 (Online Covert Employee referencing online undercover FBI agents) met with MINOR VICTIM and her parents who all provided consent to search MINOR VICTIM’s cell phone, which is an Apple iPhone X. Additionally, MINOR VICTIM

and her parents provided OCE-10127 consent to assume her online identity for multiple accounts, including her SnapChat account which she used to communicate with “Chase”.

6. That evening on June 23, 2021, pursuant to the consent to search and consent to assume online identity, OCE-10127 viewed MINOR VICTIM’s iPhone and discovered additional SnapChat communications with SnapChat user: **chasevowels05** [herein after referred to as SUBJECT ACCOUNT] where child sexual abuse material (CSAM) was requested and produced between MINOR VICTIM and SUBJECT ACCOUNT.
7. On June 24, 2021, Special Agents and Task Force Officers (TFO) at the FBI in New York – Westchester Resident Agency (RA) – requested and served an administrative subpoena (subpoena number 703536) to SnapChat, Inc. requesting the subscriber information and internet protocol (IP) logs from January 1, 2021 to June 24, 2021 for SnapChat account: chasevowels05.
8. SnapChat, Inc. returned with a letter of authenticity and subscriber information as follows:
 - a. Username: chasevowels05
 - b. Email address: chasevowels05@gmail.com
 - c. Phone number: (502) 644-6956
9. Agents and TFO’s were able to identify the (502) 644-6956 phone number as a T-Mobile USA, Inc. number. On July 9, 2021, agents and TFO’s requested and served an administrative subpoena (subpoena number 706915) to T-Mobile USA, Inc. requesting customer and subscriber information, length of service, telephone or instrument numbers, and more.
10. T-Mobile USA, Inc. returned with the following information:
 - a. Customer name: Chase Vowels

- b.** Subscriber name: Edwin Vowels
- c.** Service/billing address: 5407 Fennel Ct. Louisville, KY 40258
- d.** IMSI: 310260163602832
- e.** IMEI: 359823611552430

11. Through open source and database research, agents and TFO's discovered a JONATHAN CHASE VOWELS, white/male, date of birth 07/12/2000, social security number: XXX-XX-9505, who showed possible address of 1222 Falcon Drive, Louisville, KY 40213. VOWELS bears red hair and hazel eyes.
12. On June 29, 2021, OCE-10127 conducted a forensic examination of MINOR VICTIM's cell phone. OCE-10127 discovered chats between MINOR VICTIM and SUBJECT ACCOUNT which were sexual in nature and where MINOR VICTIM produced and sent nude photographs and videos of herself to SUBJECT ACCOUNT. It appears the extraction did not obtain all chats that were exchanged between MINOR VICTIM and SUBJECT ACCOUNT. The descriptions of each photograph and video will be described below at the time in the conversation when it was sent.
- a.** The first messages were on 03/07/2021 at 10:54 p.m. where SUBJECT ACCOUNT engaged MINOR VICTIM in casual conversation.
 - b.** On 04/19/2021 between the hours of 2:06 a.m. to 8:44 p.m. the following conversation occurred between SUBJECT ACCOUNT (SA) and MINOR VICTIM (MV). As the conversation is lengthy, only the pertinent messages are summarized below:
 - SA: Wanna see my cock?
 - MV: Sure!
 - MV: wow I love itttt

(It should be noted, no picture is seen in the extraction report)

- SA: Can I see your tits?
- MV: Sure!
- SA: Mmm fuck did u just take that?
- MV: Yep!
- SA: Can we video chat?
- MV: well ive gotta get back to my work so probably not
- SA: R u wearing panties?
- MV: no
- SA: So just the jacket?
- MV: ye
- SA: Hot!
- **SA: If u could do porn professionally rn at 13 would u?**
- MV: Sure!
- SA: U should make an onlyfans
- SA: Can I see a vid of u smiling and saying “Hi Chase” with ur tits out?
- MV: yeah probably not these walls are paper then
- MV: thin
- SA: Well at least a vid of u smiling with ur full face and tits out anyways.
Send it in chat
- MV: ok
- MV: so just a vid of me smiling with my tits?
- SA: Actually can u be naked?
- MV: Sure!
- SA: Show ur whole body off like spread ur legs and play with ur pussy in it
- SA: Like stick the remote in it
- MV: I threw it out lol
- SA: Why lmao
- MV: it doesn’t work plus it stinks
- SA: Got any other toys?
- MV: I got a marker
- SA: Okay use that
- MV: alright
- **a) At 2:39 a.m. MINOR VICTIM sent a 35-second-long video. In the video a minor female, who affiant can visually identify as MINOR VICTIM,**

was standing and was fully nude. MINOR VICTIM's face, dark hair, exposed breasts and exposed vagina were visible in the video. MINOR VICTIM repeatedly inserted what appears to be a marker inside her vagina. There was noise in the background of the video that sounded similar to a news cast. The video appeared to be in a room.

- SA: Mmmm fuck can I have this vid?
- MV: Sure!!
- SA: Love how hairy ur pussy is
- MV: thanks
- SA: Can I see ur pussy lips spread?
- MV: okay!
 - a) At 2:46 a.m. MINOR VICTIM sent a photograph of a female vagina, which appeared to be the focal point of the photograph. The photograph was close up and shows two fingers spreading apart the exposed vagina. Also visible in the photograph is the female's exposed anus.
- SA: God damn r u that wet rn?
- MV: mhm lol
- SA: Wanna see my cock on video chat?
- MV: hmmm not rn
- SA: I'll mute my mic
- MV: still just not rn lol sorry
- SA: Okay. Could we ever fuck?
- SA: Pls
- MV: of course!
- MV: Just let me know when you wanna come on down here!
- SA: R ur parents not home sometimes?
- MV: oh hell no they're always here
- MV: literally always here
- MV: you would have to get a hotel or something
- SA: How would I be able to pick you up without them knowing anything?
- SA: Oh yeah? You ready to have your brains fucked?
- SA: Apparently my niece who is also 13 has already fucked a 19 year old
- SA: Can I spank you with the belt?
- SA: Also do u take the plan b before having unprotected sex or after?
- MV: after
- MV: and im being serious when I say this plz don't cum inside me

- SA: Okay I'll just wear a condom
- SA: U should ask ur parents about getting an IUD
- MV: thing is they cant know
- MV: theyd call the cops
- Ik but I don't see anything wrong with asking about an IUD
- **MV: im 13. Lol**
- SA: Could I cum in ur ass?
- MV: Sure!
- SA: Maybe one day I can cum in u :)
- SA: Would u let me?
- MV: maybe not the first time lol
- MV: what about hotels?
- SA: I would have to make a reservation
- SA: Where do u live again?
- MV: London Kentucky
- SA: I meant where u live so I can see exactly how far u r from me
- SA: I'm 20 almost 21
- MV: ooh cool!
- SA: Okay can I see a pic of ur tits and face while smiling?
- MV: yeah!
- SA: Mmm fuck r u naked rn or wearing that jacket?
- MV: naked
- SA: Send a vid of u showing off ur self naked while smiling
- MV: ok!
 - a) At 3:50 a.m. MINOR VICTIM sent a 12-second-long video. In the video, a minor female is turning while smiling. Affiant can visually identify the female as MINOR VICTIM. The female was fully naked with her breasts and vagina exposed. There was a TV in the background running the news. The video appeared to be inside a bedroom.
- SA: Show ur pussy in it too like walk up close
- MV: I just put my clothes back on
- SA: Can I see a vid of u playing with ur pussy up close but without u holding ur phone. So like one of u laying down playing with ur pussy
- MV: Im going to sleep rn sorry :(
- SA: Ugh real quick?
- MV: here you go!

a) At 8:44 p.m. MINOR VICTIM sent a 37-second-long video showing an exposed female vagina, which appeared to be the focal point of the video. In the video the female was using her hand to rub her vagina. The video was taken up close to the vagina.

- SA: Fuck
- MV: u like it?
- SA: Yes definitely sounds/looks like it need some cock

b. On 04/20/2021 between the hours of 5:53 a.m. to 9:40 p.m. the following conversation occurred between SUBJECT ACCOUNT (SA) and MINOR VICTIM (MV). As the conversation is lengthy, only the pertinent messages are summarized below:

- SA: You naked?
- MV: nope
- MV: okay!
- SA: Yummy
- MV: hmmm whatever you wanna do!
- SA: I wanna eat you out
- SA: Can I take videos of me fucking u?
- MV: sure!
- SA: Do u care if ur face is in them?
- MV: nah I think it will be fine
- SA: U can take vids of me too if I want to have for urself
- SA: Night beautiful
- SA: Lemme see that pussy real quick though with ur lips spread apart
- MV: okay!

a) At 6:29 a.m. MINOR VICTIM sent a photograph showing an exposed female vagina that is the focal point of the photograph. The female is using her fingers to spread apart the vagina. Also visible in the photograph is the female's exposed anus.

- SA: Mmm goodnight

c. On 04/22/2021 at 5:40 p.m. SUBJECT ACCOUNT sent a video to MINOR VICTIM saying "First car wash. She's looking nice." The video shows a vehicle at what

appeared to be a car wash station. In the video, a male walked around a light blue Toyota Corolla LE bearing Indiana paper tag: L884551. The vehicle had distinct black lettering, markings, and trim. In the first part of the video, the male who took the video could be seen in the reflection off the vehicle. The male appeared to be a white male with light colored hair wearing a blue shirt and sunglasses.

- d. On 04/22/2021 between the hours of 7:38 a.m. to 9:18 p.m. the following conversation occurred between SUBJECT ACCOUNT (SA) and MINOR VICTIM (MV). As the conversation is lengthy, only the pertinent messages are summarized below:

- MV: im actually taking a bath run lol
- SA: Show me
- MV: okay!
- SA: Mmm
- MV: I cant wait for you to fuck me ;)))
- SA: Me either :)

- e. On 04/23/2021 between the hours of 5:05 p.m. to 7:57 p.m. the following conversation occurred between SUBJECT ACCOUNT (SA) and MINOR VICTIM (MV). As the conversation is lengthy, only the pertinent messages are summarized below:

- MV: im just really horny rn so im masturbating lol
- SA: Oh yeah?
- MV: mhmm ;)
- SA: Show me
- MV: im watching tv with my sister but I will soon <333

- a) At 6:51 p.m. MINOR VICTIM sent a 47-second-long video showing an up close female vagina, which is the focal point of the video. In the video, the female is using her fingers to rub the vagina. Also visible in the video is the female's exposed anus.

- f. On 04/24/2021 at 9:40 p.m. SUBJECT ACCOUNT sent a message saying "No of

course not. I don't work weekends unless its peak season at UPS or I sign up to work a weekend".

13. After OCE-10127 took custody of MINOR VICTIM's cell phone, OCE-10127 took over MINOR VICTIM's account in which the above conversation was occurring with SUBJECT ACCOUNT. SUBJECT ACCOUNT continued to talk with OCE-10127 about topics sexual in nature, such as asking "Wanna see my cock? I shaved it.". SUBJECT ACCOUNT also sent a photograph showing the face of a white male with red hair, a goatee, and glasses with the caption, "Lemme see those tits". The male depicted in this photograph appears to match VOWELS-HARPER's Operators License photograph. Additionally, there were multiple similar face photographs SUBJECT ACCOUNT sent MINOR VICTIM depicting the same white male with red hair and a goatee.
14. On 08/17/2021, affiant conducted physical surveillance at 1222 Falcon Drive, Louisville, KY 40213 and observed a light blue Toyota sedan parked in the driveway. This vehicle appeared identical to the one SUBJECT ACCOUNT send to MINOR VICTIM on 04/22/2021 based on the light blue color, black lettering, trim, and wheels.
15. On 08/19/2021, FBI support personnel conducted a Kentucky Workforce Development search for VOWELS-HARPER, which showed he currently works for United Parcel Service (UPS).
16. OCE-10127 continued to participate in a conversation with SUBJECT ACCOUNT. On 08/16/2021, OCE-10127 created a ruse and messaged SUBJECT ACCOUNT that MINOR VICTIM would be coming to the Kentucky State Fair with her family on Thursday night (08/19/2021). SUBJECT ACCOUNT replied stating "Lemme know when you'll be there and I can meet you". SUBJECT ACCOUNT also asked OCE-10127 "Can I wear a condom please?".

17. On 08/19/2021, SUBJECT ACCOUNT messaged OCE-10127 and advised he could meet “Tomorrow morning...11 AM?”. SUBJECT ACCOUNT also messaged OCE-10127 “Cant wait! Never fucked a 13 year old before. I fucked a girl who was 16 when I was 18.” Lastly, SUBJECT ACCOUNT messaged “Cant wait to see you tomorrow morning :)”.
18. Agents and TFO’s in Louisville conducted surveillance on the hotels next to the Kentucky State Fair. Agents and TFO’s picked the Springhill Suits by Marriott, located at 820 Phillips Lane, Louisville, KY 40209 to be used in the ruse as the hotel where MINOR VICTIM would be staying. OCE-10127 advised SUBJECT ACCOUNT of the address and name of the hotel.
19. On 08/20/2021, agents and TFO’s arrived at the Springhill Suits and began surveillance, anticipating HARPER’s arrival. SUBJECT ACCOUNT was unresponsive during the morning hours, through 1100 hours when he had planned to arrive.
20. Agents and TFO’s continued surveillance on both the hotel and HARPER’s residence through the afternoon. At approximately 1413 hours, SUBJECT ACCOUNT messaged OCE-10127 that he just woke and “If you’re still down, I’d like to get a quick one in”. SUBJECT ACCOUNT then advised he was changing clothes and requested the room number MINOR VICTIM was staying in.
21. At approximately 1425 hours, surveillance units observed the blue Toyota Corolla leave the residence at 1222 Falcon Drive. Surveillance units observed there was a single male driver who was the sole occupant of the vehicle. Surveillance was maintained on the vehicle until it pulled into the Hampton Inn, located at 800 Phillips Lane, directly adjacent to the Springhill Suites. Arrest team units moved to the Hampton Inn in time to observe a white male with red hair wearing a blue shirt and black shorts walk away from the Corolla and walk into the front

lobby.

22. SUBJECT ACCOUNT began messaging OCE-10127 that he was inside the hotel and sent her a picture of a hallway in the hotel. OCE-10127 advised SUBJECT ACCOUNT he was at the wrong hotel.
23. Soon after, a male resembling HARPER was observed exiting the front lobby of the hotel and heading towards the Corolla. At that time, agents and TFO's converged on HARPER and took him into custody. The male verbally identified himself as JONATHAN CASE VOWELS-HARPER. This was later confirmed with HARPER's Kentucky driver's license he had in his possession. HARPER still had the goatee which was depicted in earlier photographs.
24. During a search incident to lawful arrest, agents and TFO's located a black Samsung Cell phone and two Durex condoms in silver plastic packaging on HARPER's person. The condoms were located in HARPER's right shorts pocket.
25. The Toyota Corolla, in which HARPER arrived to the hotel, was bearing the same Indiana temporary tag: L884551 which was seen in the above-mentioned video sent to MINOR VICTIM by SUBJECT ACCOUNT.

Conclusion

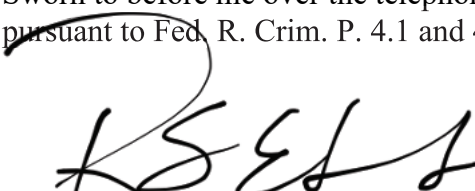
26. Based upon the above information, I submit that there is probable cause to believe that between the dates of 03/07/2021 to 04/23/2021, JONATHON CHASE VOWELS-HARPER violated the following statutes, Title 18, United States Code, Section 2422(b), by using any facility or means of interstate commerce to knowingly persuade, induce, entice, or coerce any individual who had not attained the age of 18 years, to engage in any sexual activity

for which any person can be charged; Title 18, United States Code, Section 2251(a), by persuading, inducing, enticing, or coercing a minor with the intent the minor engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct; and Title 18, United States Code, Section 2252A(a)(2) by knowingly receiving any child pornography using any means or facility of interstate commerce.

Preston M. Hoke

Preston M. Hoke
Special Agent, Federal Bureau of Investigation

Sworn to before me over the telephone and electronically signed
pursuant to Fed. R. Crim. P. 4.1 and 4(d) this 23rd day of August 2021



HON. REGINA S. EDWARDS
United States Magistrate Judge