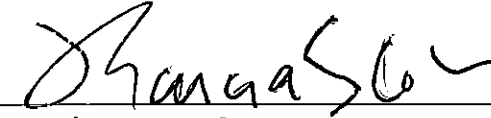


 ORIGINAL

Approved: 
Marcia S. Cohen
Assistant U.S. Attorney

Before: HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	: <u>SEALED COMPLAINT</u>
- v. -	: Violations of
	: 18 U.S.C. §§ 1343, 1349
DAVID JONES,	: & 2
DAVID DUWAYNE TAYLOR,	: COUNTY OF OFFENSE:
KRISTIN KNIGHT,	: PUTNAM COUNTY
DESTINY BISHOP,	: <u>18m8706</u>
Defendant.	:
-----	x

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEVEN MULLEN, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

1. From at least in or about August 15, 2017 up to and including at least in or about January 6, 2018, in the Southern District of New York and elsewhere, DAVID JONES, DAVID DUWAYNE TAYLOR, DESTINY BISHOP, and KRISTIN KNIGHT, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that DAVID JONES, DAVID DUWAYNE TAYLOR, DESTINY BISHOP, and KRISTIN KNIGHT, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by

means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, DAVID JONES, DAVID DUWAYNE TAYLOR, DESTINY BISHOP, and KRISTIN KNIGHT, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about August 15, 2017, DAVID DUWAYNE TAYLOR, the defendant, while in Ridgeland, South Carolina, made a phone call to an individual ("Victim-1") and demanded payment from Victim-1.

b. On or about December 28, 2017, DAVID JONES, the defendant, provided DESTINY BISHOP, the defendant, with information concerning money to be picked up by BISHOP.

c. On or about October 21, 2017, KRISTIN KNIGHT, the defendant, picked up money transmitted to Greenville, South Carolina from a victim ("Victim-2") in Dyersburg, Tennessee.

d. On or about October 28, 2017, DESTINY BISHOP, the defendant, picked up money transmitted to Greenville, South Carolina from Victim-2 in Dyersburg, Tennessee.

(Title 18, United States Code, Sections 1349.)

COUNT TWO
(Wire Fraud)

4. From at least on or about August 15, 2017 up to and including at least on or about January 6, 2018, in the Southern District of New York and elsewhere, DAVID JONES, DAVID DUWAYNE TAYLOR, DESTINY BISHOP, and KRISTIN KNIGHT, the defendants, did willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause

to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, DAVID JONES, DAVID DUWAYNE TAYLOR, DESTINY BISHOP, and KRISTIN KNIGHT, the defendants, participated in a scheme by which they fraudulently duped their victims into believing that the victims had sent sexually explicit images to underage children and faced criminal prosecution if they did not pay to avoid involvement by law enforcement.

(Title 18, United States Code, Sections 1343 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I am a Special Agent with the Department of Homeland Security, HSI and have been personally involved in the investigation of this matter. I base this affidavit on my training and experience as well as on my conversations with others, including other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. In or about August 2017, an individual ("Victim-1") reported to the HSI New York Field Office that he was the victim of extortion. In or about September 2017, I met with Victim-1 on several occasions. During these meetings, Victim-1 advised me of the following:

a. On or about August 14, 2017, Victim-1 communicated online on a dating website (the "Website") with an individual he believed to be an adult female.

b. The individual he believed to be an adult female sent him an image of what appeared to be an adult vagina. Victim-1, in turn, sent a photo of his genitals to the female.

c. The next day, Victim-1, while at his residence in Mahopac, New York, received a telephone call from a male who

4

identified himself as "James Miller," who stated that he was a private investigator in South Carolina. "James Miller" told Victim-1 that Victim-1 had sent an image of himself to a 15-year-old girl and that the family of the girl intended to pursue criminal charges. "James Miller" told Victim-1 that if he paid \$1,700 to the family, the family would not pursue the criminal charges. At some point in the conversation, an individual claiming to be the minor's father joined the conversation and told Victim-1 that his daughter was in a psychiatric ward as a result of receiving the image from Victim-1.

d. Victim-1 advised the caller that he did not have \$1,700 but that he would pay what he had. With "James Miller" still on the phone, Victim-1 traveled to a Western Union location in Mahopac, New York and transmitted \$1387 via Western Union pursuant to instructions Victim-1 received from "James Miller." "James Miller" instructed Victim-1 to transmit the money to an individual ("CC-1") in South Carolina. "James Miller" told Victim-1 that, after the family received the money, Victim-1 would not hear again from him.

e. A week later, on or about August 24, 2017, Victim-1 received a call from "James Miller" who stated that, if Victim-1 did not pay an additional amount of \$2,500, the family would go to the police.

f. Victim-1 provided me with a screenshot of the image he received from the person with whom he was communicating on the Website. I have reviewed that image ("Image-1"). Image-1 depicts what appears to be an adult vagina. A hand is visible in the photo and, on what appears to be the left ring finger, there is a silver-colored ring.

7. Victim-1 provided me with the phone on which he received the calls from "James Miller" and identified the calls he received from "James Miller." An HSI agent with special training in the forensic analysis of cell phones reviewed the contents of the phone and provided me with a report of the review. I have reviewed that report. Victim-1's phone received an incoming call on August 15, 2017 from the number Victim-1 identified as belonging to "James Miller." The call lasted approximately 1 hour and 18 minutes.

8. I have reviewed records from Western Union regarding payments made to CC-1. These records indicate that

CC-1 received approximately 12 money transfers from 6 different senders, including Victim-1, totaling approximately \$11,383.17 and that CC-1 received the payments at various Western Union locations in South Carolina.

9. On or about October 30, 2017, I spoke with an individual ("Victim-2"), who lives in Tennessee, who advised me of the following:

a. In or about September 2017, Victim-2 communicated online on the Website with an individual he believed to be an adult female. Victim-2 received an image of what appeared to be an adult vagina and, in turn, sent a photo of his genitals to the female.

b. The next day, Victim-2 received a telephone call from a male who identified himself as "James Miller" and stated that he was a private investigator. "James Miller" told Victim-2 that Victim-2 had sent an image of himself to a girl who was underage. "James Miller" said that the family of the girl intended to pursue criminal charges unless they received money from Victim-2:

c. Pursuant to instructions from "James Miller," Victim-2 went to a Western Union location in Dyersburg, Tennessee and transmitted approximately \$1,000.

d. Approximately a week later, Victim-2 received a call from "James Miller" who stated that the underage girl had committed suicide and the family wanted money to help with funeral expenses. "James Miller" stated that Victim-2 needed to pay approximately \$9,000 in order for the family not to go to the police.

e. Pursuant to directions from "James Miller," Victim-2 went to the Western Union facility in Dyersburg, Tennessee and transmitted an additional approximately \$1,000.

f. Victim-2 provided "James Miller" with an email address for Victim-2 and "James Miller" emailed Victim-2 an agreement titled "Non-Disclosure Agreement." Pursuant to instructions from "James Miller," Victim-2 signed the agreement and returned it via an email address provided by "James Miller."

g. On another occasion, pursuant to instructions from "James Miller," Victim-2 went to a Walmart in Dyersberg,

Tennessee and wired approximately \$700 to a recipient specified by "James Miller."

h. Victim-2 provided me with photocopies of Walmart receipts dated October 2, 2017, October 8, 2017, October 15, 2017, and October 20, 2017. I have reviewed these receipts. The October 2nd receipt reflects a payment of \$700 to "Kristin Knight." The October 8th receipt reflects a payment of \$900. The October 15th receipt reflects a payment of \$500 to CC-1. The October 20th receipt reflects a payment of \$536 to "Kristin Knight."

i. Victim-2 provided me with photocopies of Western Union receipts dated September 24, 2017 and October 5, 2017. The September 24th receipt reflects a payment of \$1386.31 to CC-1 and the October 5th receipt reflects a payment of \$1023.55 to CC-1.

10. I have reviewed Walmart records relating to money transfers by Victim-2. These records indicate that Victim-2 transferred money to CC-1, "Destiny Bishop," and "Kristin Knight" in October 2017. The records reflect that the money transfers were received at various Walmart locations in South Carolina. According to the Walmart records, on October 3, 2017, "Kristin Knight" received \$700 from Victim-2 at Walmart Store #641 in Greenville, South Carolina. On October 21, 2017, "Kristin Knight" received \$536 from Victim-2 at Walmart Store #4583 in Greenville, South Carolina.

11. On or about November 14, 2017, Victim-2 sent me, via text, an audio recording of a voicemail message (the "Voicemail-1") that Victim-2 received. Victim-2 advised me that "Voicemail-1" was from the person who had identified himself in calls with Victim-2 as "James Miller." I have reviewed the recording. In the recording, which is approximately 42 seconds in duration, a male voice states, among other things, that Victim-2 must call him immediately.

12. I have reviewed surveillance photos from Walmart that reflect an individual picking up money on October 21, 2017 sent by Victim-2 to Walmart Store #4583 in Greenville, South Carolina. Based on records provided by Walmart, I am aware that the individual in the photos provided her name as "Kristin Knight" and displayed a South Carolina drivers' license to confirm her identity.

13. In or about March 2018, an individual ("Victim-3") reported to the HSI New York Field Office that he was a victim of extortion. In or about March 2018, I spoke to Victim-3, who lives in Florida, who told me the following:

a. In or about October 2017, Victim-3 communicated online on the Website with an individual he believed to be an adult male. The male sent him an image of what appeared to be an adult penis. Victim-3, in turn, sent a photo of his genitals to the male.

b. After a few days, Victim-3 received a telephone call from a male who identified himself as a private investigator ("Private Investigator"). The Private Investigator told Victim-3 that Victim-3 had sent an image of himself to an underage person. The Private Investigator said that if Victim-3 did not want them to contact the police, Victim-3 would need to pay.

c. Victim-3 paid the Private Investigator every two weeks for a total of \$2,300.

d. Victim-3 made the payments by way of money transfers via Western Union and by purchasing Green Dot MoneyPak cards, scratching off the back to reveal the card's unique number, and then texting a photo of the card showing the unique number to the Private Investigator.

14. At my direction, Victim-3 listened to Voicemail-1. Victim-3 identified the male voice on Voicemail-1 as the voice of the Private Investigator with whom Victim-3 spoke.

15. I played Voicemail-1 for Victim-1. Victim-1 identified the male voice on Voicemail-1 as the voice of "James Miller."

16. In addition to speaking with Victim-1, Victim-2, and Victim-3, I have spoken with approximately 15 other individuals, all of whom communicated online on the Website with individuals they believed were adults, shared sexually-explicit photos, were later advised that they had sent photos to underage individuals and must pay in order to avoid police involvement, and made payments as instructed ("Additional Victims"). Based on my investigation of this case and my review of records from Walmart and Western Union, I believe that the Additional Victims

and Victim-1, Victim-2, and Victim-3, all together, made payments totaling at least \$34,305.70.

17. On or about March 6, 2018, I spoke to KRISTIN KNIGHT, the defendant, in Greenville, South Carolina. Based on my observation of KNIGHT and my review of the October 21, 2017 Walmart surveillance photos, I am aware that KRISTIN KNIGHT, the defendant, is the "Kristin Knight" who picked up money from Walmart on October 21, 2017. During my meeting with KNIGHT, she admitted, among other things, that she picked up money from Walmart on three or four occasions pursuant to instructions from another individual and that she knew that the money she was picking up was proceeds from a blackmailing scheme.

18. During my meeting with KNIGHT, the defendant, on March 6, 2017, KNIGHT identified her Facebook account as "klove313" and showed it to me.

19. I have reviewed a surveillance photo from Walmart reflecting an individual picking up money on October 28, 2017 sent by Victim-2 to Walmart Store #641 in Greenville, South Carolina. Based on records provided by Walmart, I am aware that the individual provided her name as "Destiny Bishop" and displayed a South Carolina drivers' license to confirm her identity.

20. On or about March 7, 2018, I met with DESTINY BISHOP, the defendant, in Greenville, South Carolina. Based on my observation of BISHOP and my review of the October 28, 2017 Walmart surveillance photo, I am aware that DESTINY BISHOP, the defendant, is the "Destiny Bishop" who picked up money from Walmart on October 28, 2017. During my meeting with BISHOP, she admitted, among other things, that she picked up money at Walmart and that she knew that the money she was picking up was proceeds from a blackmailing scheme.

21. During my meeting with BISHOP on March 7, 2017, BISHOP identified her Facebook account as "DESSI3214" and showed it to me.

22. I have reviewed records from the South Carolina Department of Corrections ("SCDOC") concerning DAVID JONES and DAVID DUWAYNE TAYLOR, the defendants. These records, which include photos of both JONES and TAYLOR, establish that:

9

a. DAVID JONES was an inmate at Ridgeland Correctional Facility ("Ridgeland") in Ridgeland, South Carolina from on or about June 4, 2015 until July 3, 2018.

b. From July 4, 2018 to the present, DAVID JONES has been an inmate at McCormack Correctional Facility in McCormack, South Carolina.

c. DAVID DUWAYNE TAYLOR was an inmate at Ridgeland from on or about April 15, 2014 until August 31, 2018. On August 31, 2018, TAYLOR was released from Ridgeland to supervised release.

23. Based on my conversations with an employee of SCDOC ("Employee-1"), I understand that inmates at Ridgeland are not permitted to have cell phones. Based on my conversations with another employee of SCDOC ("Employee-2"), I understand that, on March 21, 2018, corrections officers at Ridgeland seized three cell phones from a cell that DAVID JONES, the defendant, and DAVID DUWAYNE TAYLOR, the defendant, shared. JONES identified two of the phones as belonging to him and TAYLOR identified the third phone as belonging to TAYLOR. At my request, SCDOC provided the phones to HSI. On June 12, 2018, Magistrate Judge Paul E. Davison authorized a search of the three phones.

24. An HSI agent with special training in the forensic analysis of cell phones reviewed the contents of the two cell phones DAVID JONES, the defendant, identified as belonging to him, and provided me with reports concerning the information extracted from each phone. I have reviewed the reports. The report from the examination of one of the phones, an iPhone, seized from the cell of DAVID JONES ("Phone-1") revealed numerous texts between Phone-1 and an individual identified in Phone-1 as "Wayne." These texts occur from in or about December 2017 through in or about March 2018. Based on my review of the texts and my knowledge of this investigation, I believe that many of these texts relate to the scheme to defraud users of the Website. For example:

a. On February 6, 2018, there is a text from "Wayne" to Phone-1 in which "Wayne" provides, among other things, a first and last name, an address, "#570-047-0187" and "\$950.00." I am familiar with the first and last name in the message because it is the name of one of the Additional Victims ("Victim-4"). Victim-4 advised me, among other things, that, on February 6, 2018, Victim-4 sent "Destiny Bishop" \$950 via Western Union.

b. On or about February 9, 2018, Phone-1 sent a text to "Wayne" that consists of two screenshots. The screenshots appear to reflect a text conversation with an individual whose name I recognize as one of the Additional Victims ("Victim-5"). In one of the screenshots, Victim-5 says, "I'm at work not on break, trying to log into bank to see what I have and when I'm on I'll send via pay pal because I can't leave and I don't want to go to fed prison."

c. There is a series of texts from another one of the Additional Victims ("Victim-6") in or about February 2018. On February 12, 2018, Victim-6 texted, "Good morning sir. Last 200." This text attached a photo of a receipt for a \$200 GreenDot MoneyPak card and the MoneyPak card itself with the unique number scratched off and displayed.

d. On or about March 13, 2018, Phone-1 sent a text message to "Wayne" stating "Ay call this number an act like James Miller an see if this bitch named [last name]."

25. The texts between Phone-1 and "Wayne" reveal that, in a number of these communications, the individual using Phone-1 addressed "Wayne" as "Wayne."

26. The report from Phone-1 revealed, among other things, (1) additional photographs on Phone-1 of Green Dot MoneyPak cards displaying the cards' scratched-off unique numbers; (2) a photo of what appears to be Image-1; (3) photos of DESTINY BISHOP, the defendant; and (4) photos of various Walmart receipts reflecting money transfers that I have identified as being made by various victims of the fraud.

27. The report from Phone-1 also reveals at least five photos that appear, based on the angles of the photos and the data embedded in the photos reflecting that they were taken by Phone-1, to be "selfies," i.e., photos taken by the user of the phone of the user of the phone.

28. I have compared these photos that appear to be "selfies" with the photo of DAVID JONES, the defendant, contained within the SCDOC records for JONES. Based on my comparison, I believe that DAVID JONES, the defendant, is the same individual pictured in the selfies.

29. On or about May 26, 2018, I reviewed the public portions of the Facebook Account KRISTIN KNIGHT, the defendant, identified as belonging to her, i.e., "klove313." Based on my review, I observed that the Facebook page for "klove313" displayed photographs of KNIGHT and indicated that KNIGHT was Facebook friends with Facebook User ID "jhon.gotti.9212."

30. On September 4, 2018, Magistrate Judge Lisa Margaret Smith authorized a search of the Facebook Accounts with User ID "jhon.gotti.9212" ("Jones Facebook Account") and User ID "klove313" ("Knight Facebook Account").

31. I have reviewed the contents of the Jones Facebook Account. My review revealed the following, among other things:

a. The profile pictures for the Jones Facebook Account are photos of an individual who I recognize from the SCDOC photo to be DAVID JONES, the defendant.

b. Between November 18, 2017 and September 4, 2018, the Jones Facebook Account communicated at least 200 times with a Facebook account with the User ID 10002-635-573163 (the "163 Facebook Account"). In a number of these communications, the Jones Facebook Account called the user of the 163 Facebook Account "Wayne."

c. On December 28, 2017, the Jones Facebook Account received, from the 163 Facebook Account, an image that appears to be a screenshot of a text conversation between Victim-3 (whose name and phone number appear on the screenshot) and another individual. In the conversation that appears in the screenshot, the other individual states, "I was asked to inform you that the payment will be different this time. The finances will be transferred via Western Union to a member of the church family."

d. On December 28, 2017, the Jones Facebook Account sent a message to the Facebook Account with User ID "DESSI3214" ("Bishop Facebook Account"). The message included Victim-3's name and "300\$" Several seconds later, the Jones Facebook Account sent a photo to the Bishop Facebook Account. The photo is of a money transfer receipt with the sender listed as Victim-3 and the recipient listed as "DESTINY BISHOP SC."

12

e. On December 31, 2017, the Jones Facebook Account received a message from the 163 Facebook Account providing a first and last name, an address in New Mexico, the number "6722017649," and the amount, "\$400." Approximately 15 minutes later, the Jones Facebook Account received a photo from the 163 Facebook Account. The image appears to be a screenshot of a Western Union receipt. I am aware that the name listed in the message is the name of an Additional Victim with whom I spoke ("Victim-7").

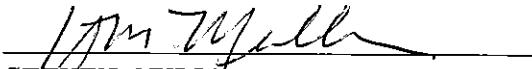
f. On January 6, 2018, the Jones Facebook Account received a message from the 163 Facebook Account with the number "1290147878," the name of Victim-7, and an address in New Mexico as described in (e) above. Following the number, name, and address is the amount, "\$386.53." Based on my investigation, I am aware that Victim-7 made a payment of \$386.53 via Western Union on January 6, 2018.

32. My review of the Jones Facebook Account revealed that one of the vanity names associated with the 163 Facebook Account is "Spike Tee." In or about November 2017, I reviewed the public portions of the "jhon.gotti.9212" Facebook account. At that time, I observed that a user named "Spike Tee" had "liked" various posts of "jhon.gotti.9212" and I observed a photograph of "Spike Tee." Based on my comparison of the photo of "Spike Tee" with the photograph of DAVID DUWAYNE TAYLOR in the records provided by SCDoc, I believe that the photo of "Spike Tee" depicts DAVID DUWAYNE TAYLOR, the defendant.

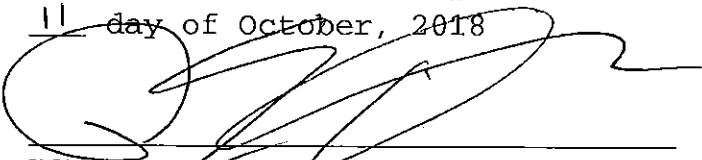
33. On October 10, 2018, at my direction, a South Carolina Parole Agent who is responsible for supervising DAVID DUWAYNE TAYLOR ("Agent-1"), the defendant, made a phone call to DAVID DUWAYNE TAYLOR, the defendant. I monitored the call as it occurred and recorded it. During the call, which lasted approximately 8 minutes, Agent-1 requested basic pedigree information from DAVID DUWAYNE TAYLOR and TAYLOR responded to Agent-1's questions. Based on my monitoring of the call and my review of the recording, I believe that the voice on Voicemail-1 is DAVID DUWAYNE TAYLOR, the defendant.

13

WHEREFORE, deponent respectfully requests that warrants be issued for the arrest of DAVID JONES, DAVID DUWAYNE TAYLOR, KRISTIN KNIGHT AND DESTINY BISHOP, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.


STEVEN MULLEN
Homeland Security Investigations

Sworn to before me this
11 day of October, 2018


HONORABLE PAUL E. DAVISON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK