

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

FILED BY KHR D.C.

May 28, 2026

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

United States of America)

v.)

PATRICK RUSSELL,)

Case No. 26-MJ-6295-SHAW-WILDER

Defendant(s)

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 12/26/25 through 5/28/26, in the county of Broward and Palm Beach in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2252(a)(2)	Receipt of Materials Depicting Child Sexual Abuse
Title 18, United States Code, Section 2252(a)(4)(B)	Possession of Materials Depicting Child Sexual Abuse

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

SA Kristin Chandler, Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/28/2026

Judge's signature

City and state: Fort Lauderdale, Florida

DETRA SHAW-WILDER, U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kristin Chandler, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. That is, I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, violations of federal law, including the offenses enumerated in Title 18, United States Code, Sections 2422, 2423, 2251, and 2252, et seq.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since January 2019. I am currently assigned to the Violent Crimes Against Children Squad and to the FBI Child Exploitation and Human Trafficking Task Force in FBI’s Miami Field Office. My duties include the investigation of crimes involving the sexual exploitation of minors, such as sex trafficking and commercial trafficking of minors, the trafficking in, production of, and possession of child pornography, and enticement violations.

3. As a federal Agent I have participated in investigations of persons suspected of violating child pornography and child exploitations laws, including Title 18, United States Code, Sections 2251, 2252, 2252A, and 2422. These investigations have included the use of surveillance techniques, undercover activities, interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. I have also conducted and assisted in child pornography and child exploitations investigations, which have involved reviewing examples of child pornography in all forms of media including computer media and have discussed and reviewed these materials with other law enforcement officers.

4. The information set forth in this affidavit is provided in support of the attached criminal complaint, charging PATRICK RUSSELL (“RUSSELL”) (DOB: 11/xx/1988) with the following violations: Title 18, United States Code, Section 2252(a)(2) (receipt of visual depictions involving the sexual exploitation of minors) and Title 18, United States Code, Section 2252(a)(4)(B) (possession of visual depictions involving the sexual exploitation of minors).

5. The statements included in this affidavit contain information I have learned through my own investigation as well as information obtained from others, including, but not limited to, law enforcement personnel, investigators, witnesses, documents, and information derived from my own personal knowledge and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint against RUSSELL, I have not included every fact or circumstance known to me or other law enforcement personnel about this investigation, but have set forth only the facts and circumstances sufficient to establish probable cause.

PROBABLE CAUSE

6. On or about March 10, 2026, FBI Cincinnati executed federal search warrants and seized a subject’s (“SUBJECT 1”) cellular device. During an interview, SUBJECT 1 informed law enforcement that he viewed, received, and distributed child sexual abuse material (“CSAM”) files via the X, Telegram, and Zangi¹ applications, and that there were CSAM files saved on the cellular device seized by law enforcement. Law enforcement conducted a forensic extraction of said device

¹ According to <https://zangi.com>, Zangi is a private communication messenger, which drives innovation in secure, high-quality private communication solutions. Zangi offers Zangi Free Messenger which allows for secure and fast messaging, calling, groups and file transfer. The app consumes the lowest data among messengers. Zangi’s system is serverless and encrypts the entire scheme with multi-level military grade encryption, ensuring the complete confidentiality and authenticity of calls and messages.

and located over 3,000 images and videos depicting CSAM, as well as other images and videos depicting potential CSAM (i.e. age questionable files), child nudity, and child erotica. The examination of the cellular device also revealed that the Zangi application was installed on the device. Law enforcement identified threads of chat messages that SUBJECT 1 exchanged with other Zangi users. FBI Miami received a lead from FBI Cincinnati regarding the user of a Zangi account with the profile name Jack C.

7. From on or about February 12, 2026, through on or about March 10, 2026, SUBJECT 1 communicated via Zangi with an individual using the profile name Jack C. SUBJECT 1 sent the Jack C account user approximately 32 links to content on X accounts. The Jack C account user sent SUBJECT 1 approximately five links to content on X accounts and one link to content on a Mega² cloud storage account. Although the majority of these links appear to be suspended or no longer available, SUBJECT 1 and Jack C's comments about these links indicate that they contained sexually explicit content involving minors. For example, on or about February 12, 2026, SUBJECT 1 sent Jack C a link to content on X. Jack C responded, "Fuck I want that Ben file soooo bad. 🤩🤩🤩🤩🤩🤩🤩 . . . Looovvee young boys exploring their bodies. Especially when one is older with a bigger cock and one is younger with a little one. Hehe."



Jack C Zangi Communications

8. Additional excerpts of the Zangi conversations between the Jack C account and SUBJECT 1 are described below:

² According to <https://mega.io>, a "MEGA cloud storage account" is a secure, user-controlled file hosting service run by Mega Limited. It is best known for its free storage allowance and "zero-knowledge" privacy, meaning files are encrypted on your device so that only you hold the keys to decrypt them.

9. On or about February 17, 2026, Jack C sent SUBJECT 1 the following message: “Home and horny for teen boys and girls. Hehe.” During this Zangi exchange, SUBJECT 1 told Jack C about a sexual relationship he had when he was approximately 12-13 years of age. SUBJECT 1 stated, “U shd goon to pics of little me 🐱.” Jack C responded, “If you have them, I 100% want to see them 🐱🐱😊😊,” “I would absolutely have fucked you and played with you’re body,” and “Rub your nipples. Suck your Young teen cock.”

10. On or about February 18, 2026, through on or about February 20, 2026, SUBJECT 1 and Jack C had the following excerpted conversations:

Sender	Message
SUBJECT 1	How young do y want me to be when you face fuck me daddy
SUBJECT 1	
SUBJECT 1	I’ll be a good little boy for u
Jack C	Preteen and teen is the best. So 11-15. Heh But I’d love you naked in my bed no matter what.
SUBJECT 1	Mmmm yes daddy.
Jack C	I know you would be
SUBJECT 1	N fuck my underage pussy
Jack C	Fuck yes
	...
SUBJECT 1	[X.com link that now leads to a page that reads “Suspended”]
SUBJECT 1	The second one 
SUBJECT 1	Lil bro needs it
Jack C	[X.com link that now leads to a page that reads “Suspended”]
Jack C	He’s begging for it
Jack C	Would pound his tight little hole for him
	...
SUBJECT 1	[X.com link that now leads to a page that reads “Nothing to See Here Yet”]
Jack C	The second boy 😏😏🐱🐱🐱🐱
SUBJECT 1	Fucj yes!
Jack C	Fuck I wish we could look at these young boys and girls together. Would love to see you get hard and play with your sexy body. 😏🐱

SUBJECT 1	Fucj tessss daddy
SUBJECT 1	[X.com link that now leads to a page that reads "Nothing to See Here Yet"]
Jack C	Mmmm they're so ready. Practicing on those tight holes.
Jack C	Braces and a bottle in the hole?? Ugh 😘😘😘😘😘
	...
Jack C	His little hole is perfect for my thick cock. Then pull out and cum all over those pretty braces.

11. On or about February 21, 2026, Jack C asked SUBJECT 1, "If you were a student in my high school English class, what would you do to hit on me to let me know you wanted to fuck?? 😘😘😘." On or about February 22, 2026, Jack C also stated, "Haha fuck I think about fucking a student alllll the time," and "If you were one of my freshman id def want to fuck you. Hehe."

12. Within the chat, the Jack C account user discussed being a teacher and a coach. Although the files are no longer saved in the account, it appears that the Jack C account user sent SUBJECT 1 images of males who attended his school. SUBJECT 1 and the Jack C account user thereafter made sexually explicit comments about these apparent students. For example, on or about February 22, 2026, it appears that the Jack C account user sent SUBJECT 1 two images of males who attended his school:

Sender	Message
Jack C	Here two cuties I know
Jack C	[Name of Minor 1] ^{3^^}
Jack C	[Name of Minor 2] ^{^^}
SUBJECT 1	Oh [Name of Minor 2] 🤩
SUBJECT 1	Fuckin sleeper build
SUBJECT 1	He's sexy asf bro
SUBJECT 1	Lemme guess. Sophomore?

³ For purposes of this complaint, the names of purported minors have been redacted.

SUBJECT 1	Shi they're both fine asf daddy
Jack C	Second one is a Junior. First one's a soph.
SUBJECT 1	Mmmm
Jack C	If only I was able to bait 🤔🤔🤔🤔🤔 fuck i want them nude so bad
	...
SUBJECT 1	Do you cum to them daddy
	[X.com link that now leads to a page that reads "Suspended"]
Jack C	I do
SUBJECT 1	Say more
SUBJECT 1	Plssss
Jack C	Always check their bulge too. Especially when in athletic shorts 🤔🤔🤔
Jack C	I want to fuck then, and others like them, soooo bad

13. The Jack C account user also discussed wanting to find someone who can "bait" the students at his school into sending nude pictures. On or about February 24, 2026, Jack C told SUBJECT 1, "I'm a coach too. Hehe. I must say.....It's always amazing and torturous when I see my boys in the lockerrooms. 🤔🤔🤔🤔." On this same date, SUBJECT 1 asked Jack C, "Do you see their naked bodies 🤔" to which Jack C responded, "I do. Running around shirtless in compression shorts" and "Been able to see a few fully nude every so often. 🤔🤔🤔🤔🤔."

14. Jack C continued the conversation by stating, "Haha it's both the best and the worst. Get to see them so much. But too risky to try much more. Which is why I'm always in search of someone who can bait to try and get nudes of them!! Lol." Jack C further stated, "Although....when I'm helping them stretch I get to touch them. Thighs. Waist. Arms. Chest. Even touched some bulges before. Hehe."

15. On or about February 24, 2026, SUBJECT 1 told Jack C, "And yeah I just saw on the news a dude around me got arrested for csam 🤔." SUBJECT 1 expressed concern that he will

end up like that one day. Jack C responded, “In hear you. And I know the feeling, trust me.” Jack C further stated, “It’s tough. We like what we like. Wasn’t exactly a choice. Haha but I think if you just stay aware and cautious overall, you’ll be ok.” On or about February 27, 2026, Jack C stated, “Love a good cute boy cumming his smooth almost hairless dick”. On or about March 6, 2026, Jack C also stated, “But you know I love preteen and teen boys and girls.”

16. On or about March 9, 2026, SUBJECT 1 sent Jack C two video files depicting potential child sexual abuse material. SUBJECT 1 and Jack C had the conversation below:

Sender	Message
SUBJECT 1	Got any vids for me daddy
Jack C	Nothing new that isn’t already in the group or sent to you. 😊😊
Jack C	You??
SUBJECT 1	Some.
SUBJECT 1	[One video, approximately one minute in length, of what appears to be a teenage male masturbating]
SUBJECT 1	[One video, approximately five minutes in length, of what appears to be a teenage male masturbating]
Jack C	What a cutie 🥰🥰🥰😊🥰
Jack C	Omg he looks like a boy I have in class rn 🥰🥰 who I def want to play with naked and fuck 😊😊😊🐱
SUBJECT 1	Mmmm yesssss show me daddy please.
SUBJECT 1	Ur so dirty.
Jack C	I’ll try to find a pic of him.

Zangi Group Chat

17. SUBJECT 1 and the Jack C account user also participated in a group chat on the Zangi application. Based on the context of the communications, it appears Jack C joined the Zangi group chat on or about February 27, 2026. The users in the group sent various links to content in other social media and messenger applications to include, but not limited to, Mega cloud storage

accounts, X accounts, Dropbox cloud storage accounts, and Telegram accounts. In addition to the content sent via the above detailed links, it appears, based on the context of the communications, that a number of other image and video files were exchanged in the group chat but were later deleted. Based on the context of the communications, it appears that the deleted image and video files contained content depicting minors engaging in sexually explicit content.

18. Law enforcement located a video file, approximately 13 seconds in duration, sent by a user in the Zangi group chat in a Mega link, on or about November 26, 2025, and on or about November 29, 2025. The video file depicts a prepubescent male lying on a bed with his legs straddled. The boy digitally penetrates his anus. Law enforcement also located a video file, approximately seven minutes and 47 seconds in duration, sent by a user in the Zangi group chat in a Mega link, on or about November 26, 2025, and on or about November 29, 2025. The video file depicts two prepubescent or early pubescent male children on a bed together. The two children remove their clothing, kiss each other, masturbate their own penises, masturbate each other's penises, and perform oral sex on each other.

19. The group members also made various comments about their sexual interest in minors. By way of example, on or about February 5, 2026, one account user stated the following: "My age of preference is like 12-14 solo and any age is being fucked 🤩." Comments made by the Jack C account user in the group chat included, but are not limited to, the following: "Omg...he is truly a fucking incredible boy 🤩🤩🤩🤩🤩🤩🤩🤩" and "Does anyone here have the Ben Grosskopf file?? 🤩 Been trying to get it for soooo long. 🤩🤩."

20. Additionally, on or about February 28, 2026, Jack C sent what appears to be a link to a Mega cloud storage account. The Mega cloud storage account links sent by Jack C, both in the group chat and in the communication with SUBJECT 1, no longer appear to be active. It should

be noted that although Jack C participated in a group chat in which users exchanged CSAM, said CSAM appeared to be exchanged prior to February 2026.

Identification of Patrick Russell

21. Account Information maintained by Zangi includes user identification numbers, profile names, registration and deletion dates, platforms (iOS, Android, or Huawei), subscription status, push tokens⁴, VOIP push tokens, country codes, unique device identifiers, status, and device models and versions.

22. On or about March 19, 2026, law enforcement subpoenaed records from Zangi requesting account information associated with profile name Jack C. Zangi provided the following:

User Identification Number: 5792474768

Name: Jack C

Registration Date: 2025-11-22 21:28:11.0

Platform: iOS

Country: US

VOIP Push Token: ce1071438f90aa1ad218e7320adc2dc2356d08e8821f12722d98e27705e6431

Push Token: 363a17caf266d6ae313abb26029c84c026e2cf9396a5f3b4bed14dc2a1a965a3

23. On or about April 16, 2026, law enforcement served Apple Inc. (“Apple”) with a 2703(d) Order requesting records for the iOS push tokens listed above. In response, Apple provided the following information: Name: Patrick Russell, IP Address: 73.1.198.113 (“IP ADDRESS 1”), Telephone Number: (419) XXX-8378 (“TN-8378”), and a home address in Deerfield Beach. The records also listed two email addresses (“Gmail Address 1 and Gmail Address 2”).

⁴ A push token is a unique, secure identifier (acting like a digital address) assigned to a specific app installed on a specific device. It allows app’s backend server to send push notifications to a user’s phone or computer through operating system services such as Apple Push Notification service.

24. According to the Florida Department of Highway Safety and Motor Vehicles, the Deerfield Beach residence is listed on RUSSELL's current Florida driver's license.

25. On or about May 12, 2026, through on or about May 13, 2026, law enforcement conducted surveillance and observed RUSSELL drive from the Deerfield Beach residence to the entrance of a school located in the Southern District of Florida. The school's faculty and staff directory website contains a photograph of RUSSELL.

26. On or about May 13, 2026, law enforcement subpoenaed Google LLC ("Google"), for subscriber and billing information, pertaining to Gmail Addresses 1 and 2. Subscriber records provided by Google, for Gmail Address 1, revealed the name Patrick Russell, the recovery email address as Gmail Address 2, and the recovery SMS/2-Step Verification Phone Number TN-8378. Subscriber records for email address Gmail Address 2 revealed the name Patrick Russell and the recovery email address as Gmail Address 1.

27. Law enforcement subpoenaed records from T-Mobile, for subscriber and billing information pertaining to TN-8378, which revealed the customer/subscriber name as Patrick Russell and the service/billing address as an address in Wisconsin. According to the Florida Department of Highway Safety and Motor Vehicles, RUSSELL was born in the state of Wisconsin. Records provided by Apple also show RUSSELL was previously associated with addresses in Wisconsin.

28. Further, law enforcement subpoenaed records from Comcast Cable Communications, for subscriber and billing information pertaining to IP ADDRESS 1, which revealed the subscriber to be Patrick Russell and the service/billing address to be the Deerfield Beach address. TN-8378 was also associated with the account.

Execution of Search Warrants on RUSSELL and the DEERFIELD RESIDENCE

29. On May 28, 2026, law enforcement staged in the vicinity of the Deerfield Beach address. At approximately 6:45AM, RUSSELL exited the Deerfield Beach address and a search of his person was conducted. An iPhone 14, assigned TN-8378, was located on RUSSELL, and an on-scene manual preview of the iPhone was conducted. Law enforcement located the Zangi application on RUSSELL's cellular device which contained the chat messages with SUBJECT 1. Within the Zangi conversation with SUBJECT 1, law enforcement located the two video files of potential child sexual abuse material received by RUSSELL on or about March 9, 2026. Law enforcement read RUSSELL his *Miranda* rights, which he waived, and an interview was conducted.

30. During the interview, RUSSELL confirmed his date of birth, telephone number, and email addresses as Gmail Address 1 and Gmail Address 2. RUSSELL informed Agents that the Zangi application was installed on his cellular device. RUSSELL recognized the Zangi account username "Jack C" as his account. RUSSELL was shown two photographs of males' faces. The photographs were screenshots from the above-described video files containing potential child sexual abuse material. RUSSELL recalled the photographs of the males' faces as from videos he received from SUBJECT 1. Specifically, RUSSELL recalled that the teenage boys were masturbating in the videos. RUSSELL believed that the boys were probably minors, under the age of 18.

31. RUSSELL also advised Agents that he has been "battling" this for a while. While RUSSELL says he has never touched a minor inappropriately, he admitted to engaging in inappropriate conversations about minors, some of which were sexual in nature. Further, RUSSELL advised that he may have requested images and/or videos of minors. RUSSELL advised

Agents that he masturbated to some of the videos he received and may have forwarded some of said videos.

32. Within the Zangi application, on RUSSELL's cellular device, law enforcement also located group chats labeled "cheese pizza party" and "Boys Trade."

33. Based on my training and experience, I am aware that "cheese pizza" is a common term and symbol that individuals involved in the collection and distribution of CSAM use to refer to those materials.

34. On or about January 5, 2026, within the "cheese pizza party" group chat, RUSSELL appears to send multiple Mega links, some of which contained sexually explicit content of age questionable males and some of which appeared to be no longer accessible.

35. Additionally, on or about February 8, 2026, SUBJECT 1, within the "cheese pizza party" group chat asks, "Anyone into girls." RUSSELL responds to the question by stating, "I am. Don't have any good teen/preteen pics or vids tho."

36. Within the "cheese pizza party" group chat, law enforcement located the following videos files:

- a. A video, approximately 14 seconds in duration, sent on or about December 26, 2025, which appears to depict a prepubescent male, naked on a bathroom floor, and masturbating.
- b. A video, approximately 48 seconds in duration, sent on or about January 2, 2026, which appears to depict a prepubescent male being anally penetrated by an adult male penis.
- c. A video, approximately 13 seconds in duration, sent on or about January 2, 2026, which appears to depict a prepubescent male performing oral sex on an adult male

penis.

- d. A video approximately three minutes and 49 seconds in duration, sent on or about January 12, 2026, which appears to depict a prepubescent male performing oral sex on another prepubescent male, lying on a bed, with his legs open. The prepubescent male also digitally penetrates the anus of the male lying on the bed. RUSSELL replies to this video by posting two fire emojis.

CONCLUSION

37. Based on the aforementioned information, your affiant respectfully submits that there is probable cause to believe that PATRICK RUSSELL did knowingly commit the offenses of Title 18, United States Code, Section 2252(a)(2) (receipt of visual depictions involving the sexual exploitation of minors) and Title 18, United States Code, Section 2252(a)(4)(B) (possession of visual depictions involving the sexual exploitation of minors).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



KRISTIN CHANDLER, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Attested to in accordance with the requirements
of Federal Rule of Criminal Procedure 4.1 by
FaceTime this 28th day of May 2026.



HONORABLE DETRA SHAW-WILDER
UNITED STATES MAGISTRATE JUDGE

FILED BY KWB D.C.
May 28, 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 26-MJ-6295-SHAW-WILDER

BOND RECOMMENDATION

DEFENDANT: Patrick Russell

Pretrial Detention
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 
AUSA: Anita G. White

Last Known Address: Deerfield Beach, Florida

What Facility: _____

Agent(s): FBI SA Kristin Chandler

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)