

FILED
12-08-2022
Clerk of Circuit Court
Washington County, WI
2022CF000603
Honorable Sandra J.
Giernoth
Branch 4

STATE OF WISCONSIN	CIRCUIT COURT	WASHINGTON COUNTY
STATE OF WISCONSIN	DA Case No.: 2022WA002881	
Plaintiff,	Assigned DA/ADA: Mandy A Schepper	
	Agency Case No.: 22-044002	
vs.	Court Case No.:	
Payton M Lamberty	CRIMINAL COMPLAINT	
		
West Bend, WI 53090		
DOB: 04/09/2001		
Sex/Race: M/W		
Defendant.		

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, December 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess recording MD5 - 2f00cc7425ba6013cbda475cc04f2634 and File Name - 558.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 2: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, December 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess recording MD5 - cd45f85815a089ceef54f408d9b285df and File Name - 612.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall

determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 3: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, December 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess recording MD5 - bc7394ec6bb26070084def51dc574b2b and File Name - 613.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 4: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, December 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess recording MD5 - 500d0a5dd04a24b29bc555044c6eec1e and File Name - 614.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 5: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, December 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess recording MD5 - 447d9bdb8ea71cfbce10857482a74a47 and File Name - 608.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 6: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - c01f70c28cc7de80615f36bca7aae241 and File Name - paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~35- 1778a9f499.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 7: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - 5ecc97013ef3eb7a77ed6308f3aac525 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~32- 6911417c3b.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a

Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 8: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - b47c03f2d06b92d9737bf48e134bd7c8 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~36- 0c730eb162.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 9: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - 0868bdf81451725a5f8307c5bc79e02e and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~31- 72334ab736.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall

determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 10: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - 155fc3d66ee1b4ffe2af8cd927657957 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~33- b0d687d568.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 11: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - 11e541d8599ecda01c619d08b7dd24d3 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~37- e0a4bae5ae.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 12: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Thursday, October 6, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly access in any way with the intent to view recording MD5 - 4d335aba3e8eae827acf89e5a1d0d775 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~34- 77ffa6b5e1.jpg of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

PROBABLE CAUSE:

Complainant prays that said defendant be dealt with according to law. The basis for the complainant's charge of such offense is he is a sworn officer with the West Bend Police Department and bases his information upon review of the official police report of Detective J. Chihak of the West Bend Police Department, who reports on November 23, 2022, he received a case referral from the Program and Policy Analyst (PPA) Matthew Lochowitz from the Wisconsin Department of Justice (DOJ), who is assigned to the Internet Crimes Against Children (ICAC) Task Force of Wisconsin. Detective Chihak reports that he reviewed the case referral and learned that on November 16, 2022, PPA Lochowitz reviewed CyberTipline Report 13609055 from the National Center for Missing and Exploited Children (NCMEC) that originated from Snapchat (Snap Inc.). The CyberTipline Report 13609055 indicated that a user saved, shared or uploaded seven (7) images depicting suspected Child Sexual Abuse Material (CSAM), which also includes child pornography. This occurred on October 6, 2022 between 8:45 a.m. Universal Time Coordinated (UTC) and 8:46 a.m. UTC, which correlates to 3:45-3:46 a.m. respectively. The suspected Snapchat account was paytonl4901 with email address: [REDACTED] and a date of birth associated with the user as April 9, 2001. Snapchat also provided the Internet Protocol (IP) address, which PPA Lochowitz obtained the subscriber information via administrative subpoena. The IP address for the subscriber was [REDACTED] in the City of West Bend, Washington County, Wisconsin.

Detective Chihak reports that a household member of that residence and suspect was identified as Payton M. Lamberty, the defendant herein. Said officer reports that on December 5, 2022, he obtained a search warrant for the defendant, his residence, and his vehicle. Said officer reports that the search warrant was executed on December 6, 2022. The defendant was not at the residence, but he was located at his place of employment.

Detective Chihak reports that he met with the defendant at his place of employment, along with Detective B. Knepprath, in an office for privacy reasons. Said officer reports that the defendant confirmed his address at [REDACTED], his date of birth, and the use of [REDACTED] email address. The defendant stated that he had one Snapchat account that he got "locked out" of a couple months prior to December 6, 2022. The defendant admitted to using his phone to look at pornography. The defendant was asked if he ever received a video where he thought the people in the video were a "little young." The defendant stated that he received mostly pictures of people he thought were young on Snapchat and Kik, but mainly on the Snapchat account that got "locked." The defendant stated he received about ten (10) pictures of kids/children and videos of someone under the age of 18. The defendant stated he did not save the images on "gallery" (on his phone), but he did save the images to his Snapchat account. The defendant stated that he went onto a website to chat with people that was similar to Omegle. The defendant stated he would chat with people and receive images. The defendant stated that he then transferred the images from the website to his Snapchat. The defendant stated he did not know anyone in the images, and he believed the children were about middle school aged or about 13 years old.

Detective Chihak further reports that the defendant stated that the images showed mostly girls, including their breasts and vaginas. The defendant stated he was attracted to the girls in the images, which is why he saved them. The defendant also admitted to masturbating to the images on one occasion. The defendant also denied sending the images to anyone. The defendant also stated that the images he saved to Snapchat were only kept about an hour before his Snapchat account was locked/suspended that same night he received and saved the images. The defendant then admitted sending some PG-13 images to the person who sent him the images he saved to his Snapchat. He stated the images he sent were of people under 18, but they were wearing clothing such as panties, "short-shorts," and bras. The defendant stated that these images were obtained from Kik.

Detective Chihak further reports that he obtained the defendant's cellular phone pursuant to the search warrant, and the defendant provided his passcode. Said officer reports that DOJ Division of Criminal Investigation Agent J. Ruff performed a download of the defendant's cellular phone on December 6, 2022. Said officer reports that Agent Ruff provided a flash drive of the contents. Said officer reports that on December 6, 2022, he utilized Cellbrite Forensic Software to analyze the contents, and he located numerous images of CSAM/child pornography.

Counts 1-5 correlate to the Cellbrite download of the defendant's phone, and Counts 6-12 correlate to the NCMEC CyberTip of the defendant saving images to his Snapchat account.

1. **MD5 - 2f00cc7425ba6013cbda475cc04f2634 and File Name - 558.jpg** - Modified on 08/20/22, at 10:27 PM (local time)
 - o The image was a still image of a prepubescent female subject with black hair in a reclined position on what appeared to be a bed with what appeared to be a sheet over her. The girl was wearing a white shirt and light colored underwear. The girl's face was visible. The girl's arm and hand was across her stomach/waist and her fingers appeared to be pulling her underwear out of the way which exposed her vagina. The girl's vagina was exposed. The girl's vagina did not have development. The girl's vagina did not have any visible pubic hair.

2. **MD5 - cd45f85815a089ceef54f408d9b285df and File Name - 612.jpg** – Modified on 10/05/22, at 10:27 PM (local time)
 - The image was a still image of a prepubescent female subject with black hair in an apparent sitting position. The girl was wearing a white shirt. The girl's face was visible. The girl's hands were near her waist. The girl's top of the girl's vagina was exposed. The girl's vagina did not have any visible development. The girl's vaginal area did not have any visible pubic hair.
3. **MD5 - bc7394ec6bb26070084def51dc574b2b and File Name - 613.jpg** – Modified on 10/05/22, at 10:27 PM (local time)
 - The image was still image of a prepubescent female subject with black hair standing nude in a shower. The girl's face was visible. The girl's left leg was up on the shower wall. The girl's left hand was upon her left knee. The girl's right hand was on her right thigh. Both of the girl's breasts and her vagina were exposed. The girl's breasts and vagina did not have development. The girl's vagina did not have any visible pubic hair.
4. **MD5 - 500d0a5dd04a24b29bc555044c6eec1e and File Name - 614.jpg** – Modified on 10/05/22, at 10:27 PM (local time)
 - The image was a still image of a prepubescent female subject with black hair in a semi-reclined position wearing a white shirt. The girl's shirt was partially in her mouth and pulled up to expose her lower abdomen. The girl's face was visible. The girl's vagina was exposed. The girl's vagina did not have development. The girl's vagina did not have any visible pubic hair.
5. **MD5 - 447d9bdb8ea71cfbce10857482a74a47 and File Name - 608.jpg** – Modified on 10/05/22, at 10:27 PM (local time)
 - The image was a still image of a prepubescent female subject with black hair standing nude in a shower. The girl's face was visible. The girl's left leg was up on the shower wall. The girl's left hand was covering her vagina and her right hand was on her waist. Both of the girl's breasts were exposed. The girl's breasts did not have development. The girl's vaginal area did not have any visible pubic hair.
6. **MD5 - c01f70c28cc7de80615f36bca7aae241 File Name - paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~35- 1778a9f499.jpg**; – the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.
 - The image was a still image of a nude prepubescent white female subject with brown hair in a seated position. The girl's hair was tied in two pigtails with pink hair ties on each pigtail and she was wearing glasses. The girl was wearing a silver necklace. The girl's face was visible. There appeared to be a clear liquid similar to ejaculate on the girl's chest down to her lower abdomen. The girl's breasts were exposed. The girl's vagina was also exposed and there was a penis inserted into her vagina. The girl's vagina and breasts had no development. The girl's vagina did not have any visible pubic hair.

7. **MD5 - 5ecc97013ef3eb7a77ed6308f3aac525 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~32- 6911417c3b.jpg** - the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.
- The image was a still image of a nude prepubescent white female subject with blonde hair in a seated position. The girl's face was visible in the image. The girl had her legs spread which exposed her vagina. The girl was lifting her left leg with both of her arms in what appeared to be a posed position. The girl's vagina had no development. The girl's vagina did not have any visible pubic hair.
8. **MD5 - b47c03f2d06b92d9737bf48e134bd7c8 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~36- 0c730eb162.jpg** - the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.
- The image was a still image of a partially nude prepubescent white female subject with dark hair in a reclined position on her back lying on a bed. The girl wore a purple t-shirt partially pulled up to expose her lower abdomen. The female's face was visible in the image. The girl had her legs spread which exposed her vagina. There was a clear liquid similar to ejaculate on and around her vagina and lower abdomen. The girl appeared to be a posed position and was looking in the direction of the camera. The girl's vagina had no development. The girl's vagina did not have any visible pubic hair.
9. **MD5 - 0868bdf81451725a5f8307c5bc79e02e and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~31- 72334ab736.jpg** - the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.
- The image was a still image of a nude pubescent white female subject with blonde hair in a kneeling position straddling an older mostly nude white female subject (appeared to be an adult). The adult female was in a seated position on a pink couch and had a flesh colored sex toy which appeared to have two ends: one end was protruding from the adult female's vaginal area and the other end is inserted underneath/between the child's buttocks near the child's vaginal area. The adult female had a tattoo on her upper chest and on her left upper wrist. The adult female wore a black tie and had some type of black leggings/socks on one of her legs. The child's and adult's faces were visible in the image. The girl was turned toward the camera and exposed one of her breasts. The girl appeared to be in a posed position. The girl's breast had no development. One of the adult's breasts were exposed and was developed.
10. **MD5 - 155fc3d66ee1b4ffe2af8cd927657957 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~33- b0d687d568.jpg** - the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.
- The image was a still image of a nude prepubescent white female subject with blonde hair in a partially seated and partially reclined position. The girl's face was visible in the image. The girl had her legs spread which exposed her vagina. The girl was lifting her body off the ground and using her arms and legs to support herself and looking toward the camera. The girl appeared to be a posed position.

The girl's vagina had no development. The girl's vagina did not have any visible pubic hair.

11. MD5 - 11e541d8599ecda01c619d08b7dd24d3 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~37- e0a4bae5ae.jpg - the image was saved, shared, or uploaded on 10/06/22, at 3:46 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.

- The image was a still image of a nude prepubescent white female subject with brown hair in a kneeling position. An older white female (age undetermined) was in a reclined position with her face underneath the girl's vaginal area. The older female's tongue was on the girl's exposed vagina. A white male subject was standing next to the girl and had his erect penis inserted into the girl's mouth. The girl's lips were around the penis and the girl's eyes were closed. The girl's face was visible in the image. The girl had her legs spread which exposed the upper portion of her vagina. The girl's breasts were both exposed. The older female's breasts were also visible and had some development. The girl's vagina and breasts had minimal development. The girl's vagina did not have any visible pubic hair.

12. MD5 - 4d335aba3e8eae827acf89e5a1d0d775 and File Name -paytonl4901-None-ad5e1be5-c0ed-5faf-b3f5-4cda5a782b53~34- 77ffa6b5e1.jpg - the image was saved, shared, or uploaded on 10/06/22, at 3:45 AM (CST), from Snapchat/Snap Inc. Account - paytonl4901.

- The image was a still image of a nude prepubescent white female subject with brown hair in a seated position with her legs spread and her eyes closed. The girl was seated next to a nude older pubescent white female subject with brown hair who was also in a seated position with her legs spread. The girl's and older female's faces were visible in the image. The girl's and older female's legs were spread which exposed their vaginas and their breasts were exposed. The girl and female appeared to be in a bedroom. The older female's eyes were open and she was looking in the direction of the camera. The girl's vagina and breasts had no development. The girl's vagina did not have any visible pubic hair. The older pubescent female's vagina and breasts had some development. The older female's vagina had some visible pubic hair.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on 12/08/22

Electronically Signed By:

Daniel J Gabler

Assistant District Attorney

State Bar #: 1018219

Electronically Signed By:

Det. Jacob Chihak

Complainant