

Affidavit in Support of Criminal Complaint & Arrest Warrant

3:25MJ010-RP

The information in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all of the facts related to this case.

I, Bo Swindle, being first duly sworn, hereby state the following under penalty of perjury:

1. I am a duly appointed Task Force Officer of the Federal Bureau of Investigation (FBI). I have been employed full time in law enforcement for 12 years. I am currently assigned to the FBI Oxford, MS office's Safe Street Task Force where I investigate a number of criminal violations.

Probable Cause

2. On February 26, 2025 Corinth Police Department received an email from Mississippi Department of Education (MDOE). The email stated there was an incident that was reported to their office on January 29, 2025. Detective Captain Heather Russell of the Corinth Police Department was the point of contact with the MDOE. Captain Russell followed up on the case and spoke with School Superintendent, Dr. Childress on 02/27/25. Dr. Childress recognized the incident that Capt. Russell inquired about. On 03/03/2025, FBI TFO Bo Swindle served Corinth School District with a subpoena to get all evidence, documentation, statements, videos, laptops, and anything related to this incident. TFO Swindle and Capt. Russell then went to the Corinth School District office on 03/03/25 to pick up the items listed in the subpoena. TFO Swindle and Capt. Russell were met by Dr. Childress. Dr. Childress eventually delivered the items over to TFO Swindle. TFO Swindle and Capt. Russell transported the evidence back to Corinth Police Department and started reviewing the material.

3. The material reviewed showed that on November 19, 2024, at 2:15 p.m., Corinth Middle School Principal, Chris Killough received a text from Dr. Nathan Hall regarding a Bark Alert on Teacher Wilson Jones' Computer. The Bark App monitors the network of school district computers and scans for illicit content being downloaded or shared. Killough stated he then reviewed the email from Bark, which showed a severe alert tagged as sexual at 1:17pm from Wilson Jones' computer. The file was not included. Killough contacted I.T. Director John Frame, who accessed the three (3) videos from Wilson Jones computer. Frame stated that Jones sent the content to his personal google drive, which triggered the Bark Alert. The videos depicted known Corinth students engaging in inappropriate behavior, including kissing and exposing themselves. The website used to create the images, Hailuo.ai was listed in the file name at the bottom of the images. Mr. Frame saved the files to a flash drive. Killough then called Dr. Childress to inform him of the issue and later arrived at the central office to discuss more.

4. Killough stated that Dr. Childress instructed him to meet with Mr. Jones the next morning to inquire about the Bark Alert and files on his computer.

5. On November 20, 2024, Killough stated that Frame locked Jones' computer and access to his accounts. At 8:10am, Killough stated that he and the Vice Principal met with Jones and informed him of the Bark alert. Killough stated they had retrieved his laptop from his room. Killough stated that Jones admitted he created videos using AI, but claimed it was not sexual. Killough stated Jones confirmed it was Hailuo.ai he used, and that the images came from social media. Killough stated that Jones acknowledged one of the people in the images was a local student.

6. Frame saved the files, including videos, and screen shots containing email user names and passwords of students no longer at the middle school campus. According to Killough, these were stored on Jones' Google Drive without a legitimate reason. Wilson Jones resigned on the November 21, 2024.

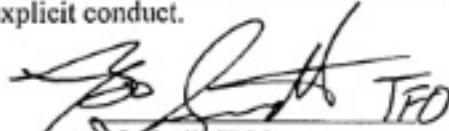
7. Documentation shows keystrokes made by Wilson Jones around the time of the Bark Alert. The following are Wilson Jones keystrokes indicating a prompt to the AI system:

8. TFO Swindle reviewed the images and videos that to his knowledge would be classified as child sexual exploitation material (CSEM). TFO Swindle and Captain Russell then began identifying 8 underage victims from the ages of 14 to 16 years of age. These victims were identified to be children that went to the Corinth School District. The videos appear to be AI-generated videos using known children from the Corinth School District and pictures uploaded on social media to create sexually explicit material.

Conclusion

9. Based on evidence above, I believe probable cause exists that on November 19th, 2024, Wilson Jones, while in Corinth, Mississippi was in violation of the following:

- a. 18 U.S.C. § 2252A(a)(7) makes it illegal to knowingly produce with the intent to distribute, by any means, including a computer, in or affecting interstate or foreign commerce, child pornography as defined in 18 U.S.C. § 2256(8)(C), that is, an adapted or modified depiction of an identifiable minor as defined in 18 U.S.C. § 2256(9).
- b. 18 U.S.C. § 2252A(a)(5)(B) makes it illegal to knowingly possess or knowingly access with intent to view film or videotape, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.
- c. 18 U.S.C. § 2256(8) defines "child pornography" as any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.


B. Swindle/TFO
Federal Bureau of Investigation

Attested to by the complainant in accordance with the requirements of Federal Rule of Criminal Procedure 4.1 by telephone, this the 6th day of March, 2025.


UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF MISSISSIPPI