

# UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

In the Matter of the Seizure of \_\_\_\_\_ )  
 (Briefly describe the property to be seized or )  
 identify the person by name and address) ) Case No. \_\_\_\_\_  
 )  
 )  
 )

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_  
*(identify the person or describe the property to be searched and give its location):*

I find that the affidavit(s), or any recorded testimony, establish probable cause to seize the person or property described above, and that such seizure will reveal *(identify the person or describe the property to be seized):*

**YOU ARE COMMANDED** to execute this warrant on or before \_\_\_\_\_ *(not to exceed 14 days)*  
 in the daytime 6:00 a.m. to 10:00 p.m.     at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to \_\_\_\_\_  
*(United States Magistrate Judge)*

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for \_\_\_\_\_ days *(not to exceed 30)*     until, the facts justifying, the later specific date of \_\_\_\_\_

Date and time issued: \_\_\_\_\_

*Leda Dunn Wettre*  
 \_\_\_\_\_  
*Judge's signature*

City and state: \_\_\_\_\_

\_\_\_\_\_  
*Printed name and title*

## ATTACHMENT A

With respect to “CFAKE.COM” and “SOCFAKE.COM” (“SUBJECT DOMAIN NAMES”), Verisign, who is the domain registry for the SUBJECT DOMAIN NAMES, shall take the following actions to effectuate the seizure of SUBJECT DOMAIN NAMES:

1. Take all reasonable measures to redirect the domain names to substitute servers at the direction of the Homeland Security Investigations, by associating the SUBJECT DOMAIN NAME to the following authoritative name-server(s):
  - a. Ns1.seizedservers.com;
  - b. Ns2.seizedservers.com; and/or
  - c. Any new authoritative name server to be designated by a law enforcement agent in writing, including e-mail, to Verisign.
2. Prevent any further modification to, or transfer of, SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with Homeland Security Investigations or the Department of Justice.
3. Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
4. Provide reasonable assistance in implementing the terms of this Order and take no unreasonable action to frustrate the implementation of this Order.

The Government will display a notice on the website to which the SUBJECT DOMAIN NAME will resolve. That notice will consist of law enforcement emblems and text (or substantially similar text) as shown on the attached page.

**THIS DOMAIN HAS BEEN SEIZED**

by the United States Department of Homeland Security, Homeland Security Investigations (HSI) New Jersey Field Office pursuant to a seizure warrant issued by the U.S. District Court for the District of New Jersey as part of coordinated law enforcement actions by HSI, French National Police, the Paris Prosecutor's Office, Italy's Polizia di Stato- Postal and Cybersecurity Police, United States Department of Justice's Computer Crime and Intellectual Property Section and the United States Attorney's Office for the District of New Jersey for violations of 47 U.S.C. § 223.

The TAKE IT DOWN ACT (47 U.S.C. § 223) prohibits the nonconsensual publication of intimate imagery and digital forgeries (i.e., deepfakes). Violators are subject to fines, imprisonment or both.

**ATTACHMENT C**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN THE MATTER OF THE SEIZURE OF  
THE DOMAIN NAMES  
CFAKE.COM and SOCFAKE.COM

Hon. Leda Dunn Wettre, U.S.M.J.

Mag. No. 26-13095

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEIZURE WARRANT**

I, Special Agent Ashley D'Angelo, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") and have been since 2023. I am currently assigned to the Newark, New Jersey Special Agent in Charge (SAC) Office Cyber Crimes Group (CCG). I have received training and have gained experience in interview and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer crimes and computer evidence identification, computer evidence seizure and processing, and various other cyber-crime investigations such as those involving business email compromise, darknet marketplaces and network intrusions. I have participated in multiple investigations, including cyber-crime investigations.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. As set forth below, there is probable cause to believe that the domain names CFAKE.COM (“SUBJECT DOMAIN NAME-1”) and SOCFAKE.COM (“SUBJECT DOMAIN NAME-2”) (collectively, the “SUBJECT DOMAIN NAMES”), are property used to commit violations of 47 U.S.C. § 223(h)(3)(A) (the “SUBJECT OFFENSE”), and subject to seizure and forfeiture pursuant to 47 U.S.C. § 223(h)(7)(A)(i) & (iii) and 21 U.S.C. § 853(f). I make this affidavit for a warrant to seize the property described in Attachment A, specifically, the SUBJECT DOMAIN NAMES.

4. The procedure by which the government will seize the SUBJECT DOMAIN NAMES is described in Attachment A hereto and below.

#### **THE SUBJECT OFFENSE**

5. Title 47, Section 223(h)(3)(A) of the United States Code provides, in relevant part, that a person shall be guilty of a federal offense if that person, in interstate and foreign commerce, uses an interactive computer service to knowingly publish a digital forgery of an identifiable individual who is not a minor if: (i) the digital forgery was published without the consent of the identifiable individual; (ii) what is depicted was not voluntarily exposed by the identifiable individual in a public or commercial setting; (iii) what is depicted is not a matter of public concern; and (iv)

publication of the digital forgery is intended to cause harm or causes harm, including psychological, financial, or reputational harm, to the identifiable individual.<sup>1</sup>

### **BACKGROUND ON DOMAIN NAMES**

6. Based on my training and experience and information learned from others, I am aware of the following:

7. Domain Name: A domain name is a string of text that maps to an IP address and serves as an easy-to-remember way for humans to identify devices on the Internet (e.g., “justice.gov”). Domain names are composed of one or more parts, or “labels,” delimited by periods. When read right-to-left, the labels go from most general to most specific. The right-most label is the “top-level domain” (“TLD”) (e.g., “.com” or “.gov”). To the left of the TLD is the “second-level domain” (“SLD”), which is often thought of as the “name” of the domain.

8. Domain Name System: The Domain Name System (“DNS”) is the way that Internet domain names are located and translated into IP addresses. DNS functions as a phonebook for the Internet, allowing users to find websites and other resources by their names while translating them into the IP addresses that their computers need to locate them.

9. Domain Name Servers: Domain Name Servers (“DNS servers”) are devices or programs that convert, or resolve, domain names into IP addresses when queried by web browsers or other DNS “clients.”

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<sup>1</sup> The statute contains several exceptions, none of which eliminate probable cause as described herein. See 47 U.S.C. § 223(h)(3)(C).

10. Registrar: A registrar is a company that has been accredited by the Internet Corporation for Assigned Names and Numbers (“ICANN”) or a national country code top-level domain (such as .uk or .ca) to register and sell domain names. Registrars act as intermediaries between registries and registrants. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

11. Registry: A domain name registry is an organization that manages top-level domains, including by setting usage rules and working with registrars to sell domain names to the public. For example, the registry for the “.com” and “.net” top-level domains is VeriSign, Inc., which is headquartered at 12061 Bluemont Way, Reston, Virginia.

12. Registrant: A registrant is the person or entity that holds the right to use a specific domain name sold by a registrar. Most registrars provide online interfaces that can be used by registrants to administer their domain names, including to designate or change the IP address to which their domain name resolves. For example, a registrant will typically “point” their domain name to the IP address of the server where the registrant’s website is hosted.

13. WHOIS: WHOIS is a protocol used for querying databases that store registration and other information about domains, IP addresses, and related Internet resources. For example, results from a WHOIS search of a domain would likely include contact information for the registry, the registrar, and the ISP that owns the IP address to which the domain points. Contact information for the

registrant of the domain might be provided but is often redacted, masked, or inaccurate.

14. Interactive computer service: The term “interactive computer service” means any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server, including specifically a service or system that provides access to the Internet and such systems operated or services offered by libraries or educational institutions.

### **CASE BACKGROUND**

15. As observed by HSI, the SUBJECT DOMAIN NAMES take visitors to what appear to be identical copies a pornographic website (hereinafter, “CFAKE”), which contains thousands of digital forgeries that depict female celebrities nude and/or engaging in sex acts. The CFAKE landing page states that the depictions are “digitally retouched and altered photos of well-known people and are not intended to be a true representation of the celebrities or the activities they engage in.” See Figure 1.



*Figure 1: CFAKE Landing Page*

16. The Terms and Conditions page on CFAKE states that “[e]very celebrity picture on this site, other than those explicitly marked as real, is fake.” It goes on to

address those who may be upset about their representation on CFAKE: “[I]f you are a celebrity who is upset at your representation here, please contact us and we will do our best to work it out with you. We would like to know, though, why you feel you are at a particular disadvantage while practically every female celebrity in the world is also here.” See Figure 2. The CFAKE site lists admin@cfake[.]com as the contact email address.

**CFake - Disclaimer**

This site is in no way affiliated with any of the celebrities it currently holds.

Every celebrity picture on this site, other than those explicitly marked as real, is fake. These pictures are strictly photo manipulations for fun and fantasy. As for intent, nothing on our archive should be taken seriously. Fake pictures are also some kind of criticism and commentary, the creator does a "digital caricature" of a celebrity. However, if a celebrity who is upset at your representation here or any picture is trampling on a trademark or distributing a copyrighted image, please contact us with details. It will be removed as soon as practically possible. Or if you are a celebrity who is upset at your representation here, please contact us and we will do our best to work it out with you. We would like to know, though, why you feel you are at a particular disadvantage while practically every female celebrity in the world is also here.

*Figure 2: Excerpt of CFAKE Terms and Conditions*

17. While not explicitly stated, it appears that much of the CFAKE library consists of user-generated digital forgeries that are uploaded for publication. The main CFAKE page links to a tab called “upload,” which appears to allow users to upload content to CFAKE. The main page also links to a tab called “tags,” which allows visitors to search by various categorizations, including “publisher.” See Figure 3. Selecting the “publisher” categorization reveals a list of screennames for over 1000 people. See Figure 4. Each screenname links to a collection of images and videos that appear to have been uploaded by the “publisher” associated with that screenname.

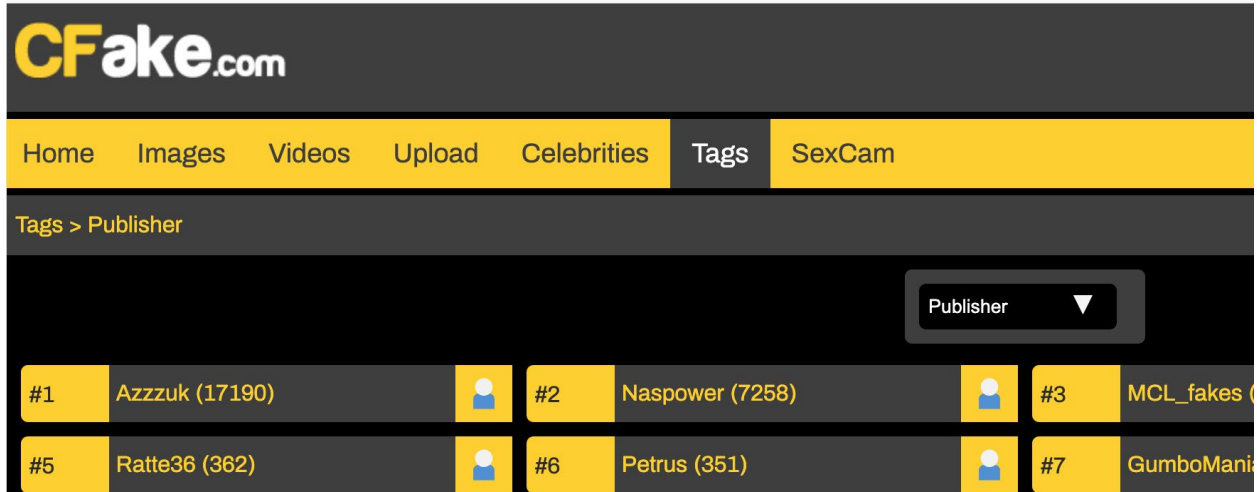


Figure 3: CFAKE Tabs

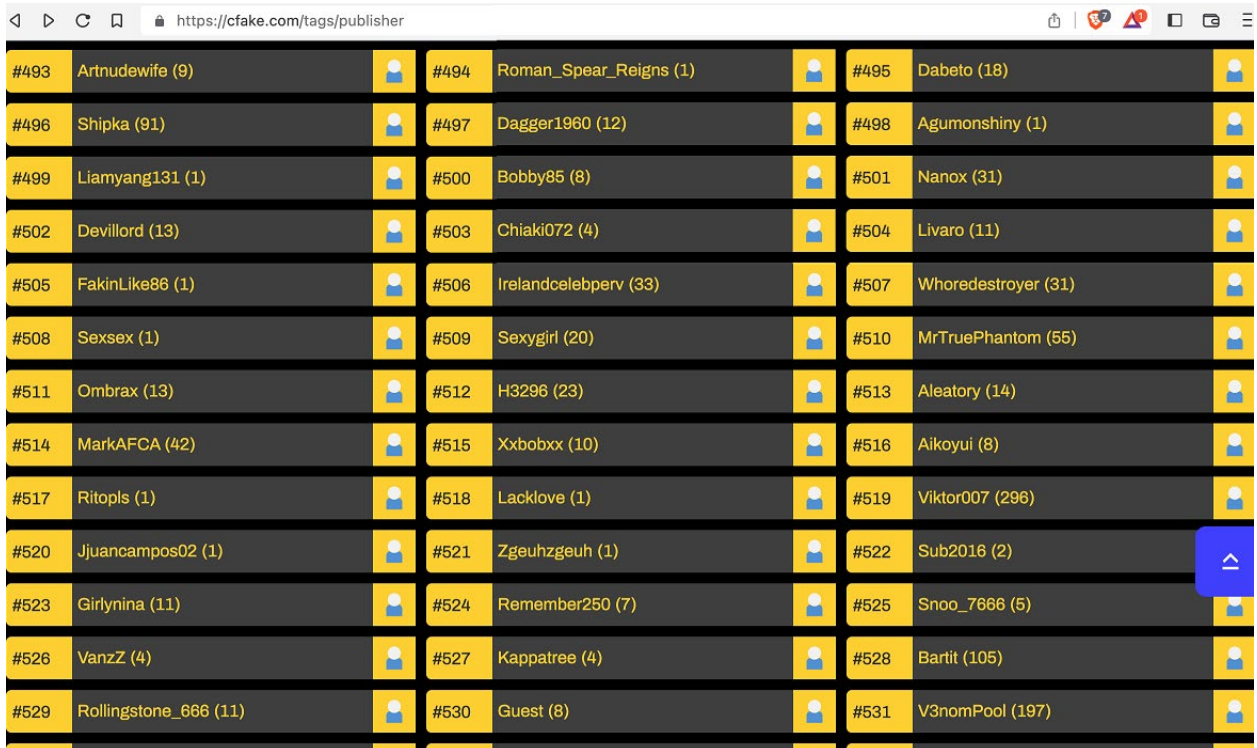


Figure 4: Screenshot of CFAKE Publishers

18. In addition to sorting by publisher, the “tag” tab allows visitors to search by “sex category.” Among the numerous sex categories are those alluding to violence,

such as “degradation,” “rape,” “bondage,” and “forced.” There is also a sex category simply entitled “school.” See Figures 5 and 6.

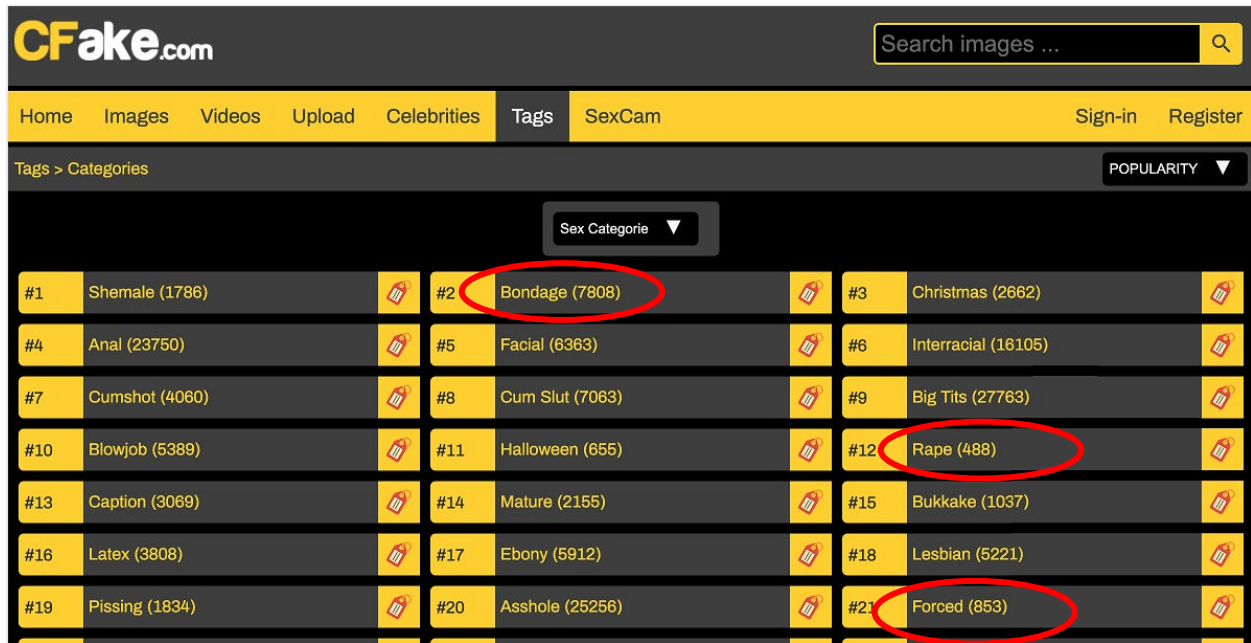


Figure 5: List of “Sex Categories”

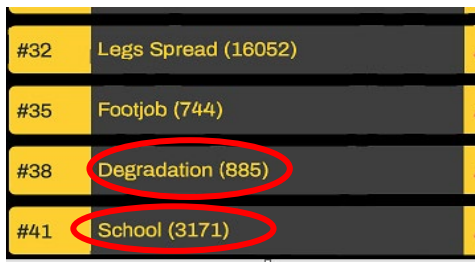


Figure 6: List of “Sex Categories,” cont'd.

19. The “tag” tab also allows visitors to search by “job,” referring to the category or profession of the female celebrity depicted in the digital forgery. See Figure 7.

Home				Images				Videos				Upload				Celebrities				Tags				SexCam				Sign-in				Register																																																																																																			
Tags > Jobs																				POPULARITY ▼																																																																																																															
Jobs ▼																																																																																																																																			
#1	Politician (4725)		#2	Sports (8763)		#3	YouTuber (5237)		#4	Cartoon (17924)		#5	TV Presenter (18886)		#6	Actress (248148)		#7	Wrestler (3833)		#8	Singer (98616)		#9	First Lady (678)		#10	Weather Presenter (1079)		#11	TV Series (7358)		#12	Crown (2308)		#13	TV Star (11431)		#14	Video Game (4341)		#15	Internet Personality (2766)		#16	TV News (1891)		#17	Journalist (7300)		#18	TV Hostess (5636)		#19	Business Woman (608)		#20	Model (61836)		#21	TV Actress (2353)		#22	Comics (6268)		#23	News Anchor (478)		#24	Cosplayer (1166)		#25	TV Moderator (254)		#26	TV Reporter (344)		#27	Sports Journalist (311)		#28	TV Journalist (329)		#29	TV Cook (536)		#30	Miss (2270)		#31	Voice Actress (777)		#32	TV Anchor (246)		#33	Twitch Star (1428)		#34	Comedian (1417)		#35	Hentai (4083)		#36	Lawyer (410)		#37	TV Personality (2870)		#38	TV Sport News (170)		#39	Glamour Model (241)		#40	Musician (4541)		#41	TV Reality Star (304)		#42	Humorist (115)		#43	Showgirl (615)		#44	Activist (228)	

*Figure 7: List of “Jobs”*

20. On or about February 20, 2026, HSI interviewed VICTIM-1, who is depicted engaging in sex acts in digitally forged images published on the CFAKE site. VICTIM-1 stated that the images of VICTIM-1 on the CFAKE site are digital forgeries and that VICTIM-1 did not consent to the creation or the publication of those digital forgeries of VICTIM-1 on the CFAKE site.

21. Thus, there is probable cause to believe that the person or persons who published on the CFAKE site digitally forged images depicting VICTIM-1 engaging in sex acts violated the SUBJECT OFFENSE. That is because the CFAKE site is an interactive computer service and, additionally, (1) the images of VICTIM-1 are digital forgeries and VICTIM-1 did not consent to either the creation or publication of those images; (2) VICTIM-1 did not voluntarily expose in a public or commercial setting what is depicted of VICTIM-1 on the CFAKE site; (3) what is depicted of VICTIM-1 on the CFAKE site is not a matter of public concern; and (4) the publication of the

digital forgery of VICTIM-1 on the CFAKE site is intended to cause harm and has caused harm—including psychological harm—to VICTIM-1.

22. There is also probable cause to believe that the owners and operators of the CFAKE site violated and aided and abetted the violation of the SUBJECT OFFENSE. That is because the owners and operators of CFAKE created the CFAKE site and invited, encouraged, and permitted others to publish digitally forged images—like those of VICTIM-1—on the CFAKE website without the consent of the victim depicted in the image and under circumstances that very predictably caused psychological, financial, and reputational harm to the victims.

23. That the owners and operators of the CFAKE website made no effort to obtain publication consent of the victims depicted in the digitally forged images that those owners and operators invited, encouraged, and permitted to be published the CFAKE website is made clear by the website itself. Specifically, the website expressly invites any victim “upset” by their “representation” on the CFAKE website to “contact” the CFAKE website operators so that those operators can “do [their] best to work it out with” the victim after the fact.

24. Because CFAKE explicitly encourages users to post digital forgeries of celebrities generally, there also exists probable cause to believe that many of the identifiable people did not consent to the publication of the digital forgeries published on CFAKE.

### **THE SUBJECT DOMAIN NAMES**

25. As described above, the SUBJECT DOMAIN NAMES were used to commit violations of the SUBJECT OFFENSE.

26. A search of publicly available WHOIS domain name registration records revealed that SUBJECT DOMAIN NAME-1 was registered on or about April 27, 2007, and is currently registered through April 27, 2027. The publicly available WHOIS database lists a privacy protection service that conceals the identity of the true owner. As of the date of this affidavit, typing SUBJECT DOMAIN NAME-1 into a web browser takes the computer to the CFAKE website described above.

27. A search of publicly available WHOIS domain name registration records revealed that SUBJECT DOMAIN NAME-2 was registered on or about May 14, 2025, and is currently registered through May 14, 2027. The publicly available WHOIS database lists a privacy protection service that conceals the identity of the true owner. As of the date of this affidavit, typing SUBJECT DOMAIN NAME-2 into a web browser takes the visitor to the CFAKE website described above.

28. The top-level domain for the SUBJECT DOMAIN NAMES is .com. Verisign currently manages all .com domains, i.e., Verisign is the Registry for .com.

#### **STATUTORY BASIS FOR SEIZURE AND FORFEITURE**

29. Title 47, United States Code, Section 223(h)(7)(A) provides:

The Court, in imposing a sentence on any person convicted of a violation of [Section 223(h)(2) or (3)], shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that the person forfeit to the United States—

- (i) any material distributed in violation of that paragraph;
- (ii) the person's interest in property, real or personal, constituting or derived from any gross proceeds of the violation, or any property traceable to such property,

obtained or retained directly or indirectly as a result of the violation; and

- (iii) any personal property of the person used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the violation.

47 U.S.C. § 223(h)(7)(A).

Title 47, United States Code, Section 223(h)(7)(B) provides: “Section 853 of title 21, with the exception of subsections (a) and (d), shall apply to the criminal forfeiture of property under subparagraph (A).”

- 30. In turn, Title 21, United States Code, Section 853(f) provides:

The Government may request the issuance of a warrant authorizing the seizure of property subject to forfeiture under this section in the same manner as provided for a search warrant. If the court determines that there is probable cause to believe that the property to be seized would, in the event of conviction, be subject to forfeiture and that an order under subsection (e) may not be sufficient to assure the availability of the property for forfeiture, the court shall issue a warrant authorizing the seizure of such property.

21 U.S.C. § 853(f).

- 31. Title 21, United States Code, Section 853(l) provides that U.S. district courts shall have jurisdiction to enter orders without regard to the location of any property which may be subject to forfeiture. Venue for criminal forfeitures lies in the district where the criminal prosecution may be brought.<sup>2</sup>

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<sup>2</sup> In or around January 2026, the CFAKE website was hosted in the District of New Jersey.

32. As set forth above, there is probable cause to believe that the SUBJECT DOMAIN NAMES are subject to criminal forfeiture because they were used in the commission of violations of the SUBJECT OFFENSE. Specifically, the SUBJECT DOMAIN NAMES were used to publish digital forgeries of identifiable individuals without the depicted individuals' consent.

33. I further submit that a restraining order under 21 U.S.C. § 853(e) might not be sufficient to assure the availability of the SUBJECT DOMAIN NAMES for forfeiture because the domains could be placed back into the pool of available addresses and re-registered. In addition, seizure of the SUBJECT DOMAIN NAMES is necessary to prevent their continued abuse. The court should therefore issue a warrant authorizing the seizure of the SUBJECT DOMAIN NAMES.

#### **SEIZURE PROCEDURE**

34. As detailed in Attachment A, upon execution of the seizure warrant, the registry for .com, Verisign, headquartered at 12061 Bluemont Way, Reston, Virginia, shall be directed to restrain and lock the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with Homeland Security Investigations or the Department of Justice.

35. In addition, upon seizure of the SUBJECT DOMAIN NAMES by the United States, Verisign will be directed to associate the SUBJECT DOMAIN NAMES to a new authoritative name server(s) to be designated by the United States. The Government will display a notice on the website to which the SUBJECT DOMAIN NAMES will resolve indicating that the site has been seized pursuant to a warrant issued by this court.

### CONCLUSION

36. For the foregoing reasons, I submit that there is probable cause to believe that the SUBJECT DOMAIN NAMES are and were being used to commit the SUBJECT OFFENSE. Accordingly, the SUBJECT DOMAIN NAMES are subject to forfeiture to the United States pursuant to, 47 U.S.C. § 223(h)(7), and to seizure 47 U.S.C. § 223(h)(7)(B) and 21 U.S.C. § 853(f). I respectfully request that the Court issue a seizure warrant for SUBJECT DOMAIN NAMES.

37. Because the warrant will be served on Verisign, which controls the SUBJECT DOMAIN NAMES, and Verisign, thereafter, at a time convenient to it, will transfer control of the SUBJECT DOMAIN NAMES to the government, there

exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,

*Ashley D'Angelo*

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Ashley D'Angelo  
Special Agent  
Homeland Security Investigations

*Special Agent D'Angelo attested to this Affidavit by telephone pursuant to FRCP 4.1(b)(2)(A) on June 5, 2026.*

*Leda Dunn Wettre*

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Hon. Leda Dunn Wettre  
United States Magistrate Judge