

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

February 26, 2026

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

United States of America
v.

Case No. 1:26-MJ-011-BU

ERVIN JOE CAMPBELL

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 February 26, 2026 in Taylor in the Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code, Section 2422(b)

Attempted Enticement of a Minor

This criminal complaint is based on these facts:

See the attached affidavit which is incorporated herein.

Continued on the attached sheet.

Whitney James
Whitney James, AUSA


Complainant's signature

HSI - Michael Baker

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 3.

Date: February 26, 2026


Judge's signature

City and state: Abilene, Texas

John R. Parker, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Baker, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent (SA) of Homeland Security Investigations (HSI) within the United States Department of Homeland Security (DHS), assigned to the HSI Abilene, Texas office, and have been employed by HSI since October 2022. I have been employed as a federal law enforcement agent for approximately seventeen years and have a bachelor's degree in criminal justice from Eastern Kentucky University. As a federal agent I have successfully completed multiple academies to include the Criminal Investigator Training Program and the HSI Special Agent Training Program, both located at the Federal Law Enforcement Training Center in Glynco, Georgia as well as the Border Patrol Agent academy held at the Federal Law Enforcement Training Center in Artesia, New Mexico.

2. As an HSI Special Agent, I have conducted and participated in numerous complex investigations, to include but not limited to, child exploitation violations, narcotics violations, immigration violations, and customs violations, which have culminated in successful federal prosecution.

3. This affidavit is made in support of an application for a criminal complaint for Ervin Joe CAMPBELL, who resides in Anson, Texas. I have developed overwhelming evidence that CAMPBELL has violated 18 U.S.C. § 2422(b) Attempted Enticement of a Minor.

4. The statements in this affidavit are based upon the investigation I have conducted and based on conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous similar investigations, public source

and business records, and my experience and background as a federal law enforcement agent. Since this affidavit is being submitted for the limited purpose of a complaint affidavit, I have not included each and every fact known concerning this investigation.

TITLE 18, UNITED STATES CODE SECTION 2422(b)-
Attempted Enticement of a Minor

5. Title 18, United States Code, Section 2422(b), makes it a crime to knowingly use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, an individual who had not attained the age of 18 years of age to engage in prostitution and sexual activity for which any person can be charged with a criminal offense.

6. To find a defendant guilty of this crime, the government must prove the following:

First: That the defendant knowingly persuaded, induced, enticed, coerced, attempted to persuade, induce, entice, or coerce an individual to engage in any sexual activity, or prostitution, as charged;

Second: That the defendant used the Internet, the mail, a telephone, a cell phone, or any facility or means of interstate or foreign commerce to do so;

Third: That the defendant believed that such individual was less than 18 years of age; and

Fourth: That had the sexual activity actually occurred, the defendant could be charged with a criminal offense, under the laws of Texas.

STATEMENT OF PROBABLE CAUSE

7. On February 25, 2026, Texas Department of Public Safety (DPS) Criminal Investigation Division (CID), Homeland Security Investigations (HSI), the Abilene

Police Department (APD), and the Texas Attorney General's Office (AGO) participated in an undercover chat operation in Abilene, Texas, targeting the solicitation of prostitution and child predators. During the operation, AGO Investigators posed as minors, aged fifteen and sixteen, via an undercover account (UC). The UC account posted on Facebook Marketplace as "Massage and Fun".

8. Ervin Joe CAMPBELL contacted the account and asked if the UC was independent or if they worked through a booking agent and inquired as to the services provided. The UC replied, "200 for fs." The term "fs" is commonly used and known to mean "full sex". CAMPBELL agreed to pay the amount, but only in person. CAMPBELL stated he needed a massage and the UC informed CAMPBELL that a "massage only....no sex is 100." CAMPBELL replied, "I have \$200."

9. CAMPBELL sent a picture of himself and stated he was 60 years old. CAMPBELL asked the UC's age and learned the UC was fifteen. CAMPBELL replied, "I could get in trouble", followed later by "I'm not a cop, are you?" After the UC replied that the UC was not, CAMPBELL stated, "So where are you to do this?"

10. The UC informed CAMPBELL that her sixteen year old friend was available as well and provided the price of \$500.00 for sexual intercourse with both the fifteen and sixteen year old. The following are several messages exchanged between the UC and CAMPBELL:

Marketplace
\$200 - Massage and fun

Mark as pending

More options

Don



I'm 60. How old are you?

cutie

15

is htat ok?

Don

I could get in trouble

we both could

kinda what makes it exiting

Don

I'm not a cop are you?

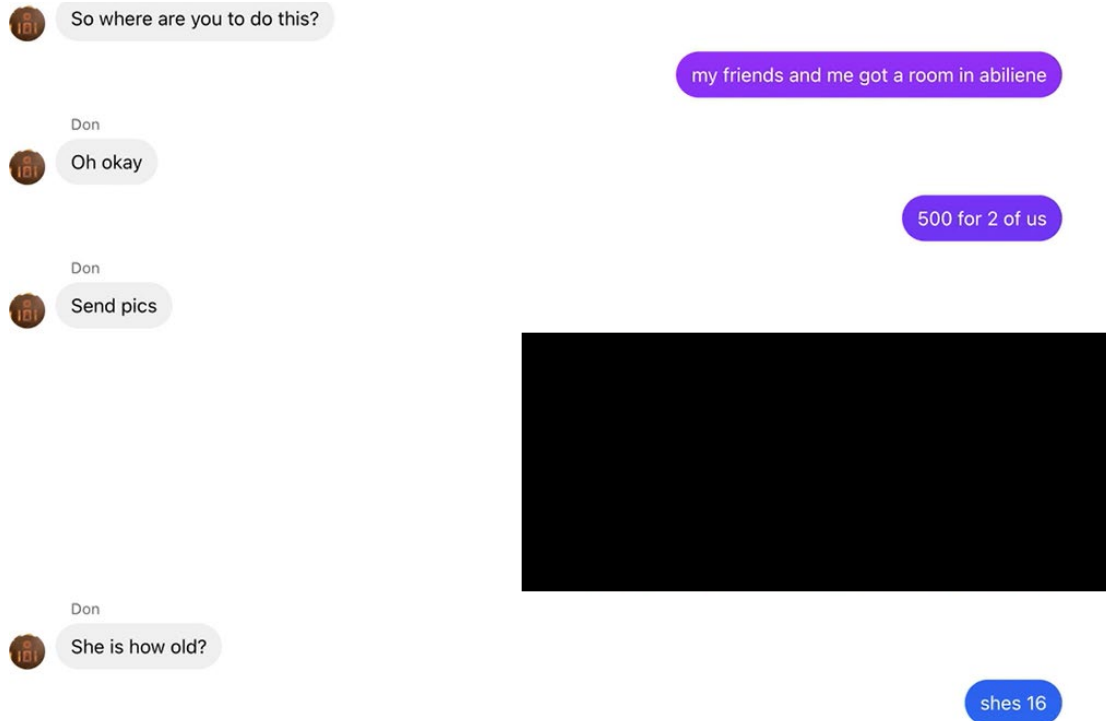
no bby

just a girl making money

Don

So where are you to do this?

my friends and me got a room in abilene



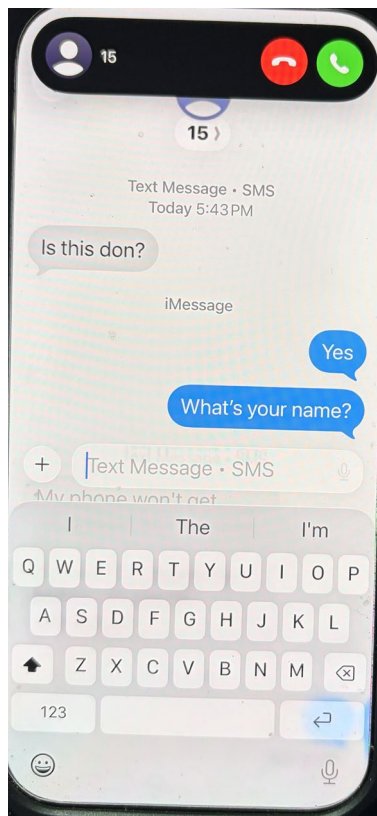
11. CAMPBELL requested the UC to send the address, provided a cellphone number, and asked if the UC would accept cash. The UC provided the address of a predetermined location to meet the two children for sex.

12. During the chat conversation, CAMPBELL said that he drove a white truck and lived in Anson. CAMPBELL estimated that it would take him approximately 30 minutes to arrive at the location.

13. Approximately 29 minutes later, agents at the predetermined location observed a white Chevrolet pickup registered to CAMPBELL arrive at the location and park in the location selected by the UC. The vehicle appeared to be occupied by one subject consistent with the age of the subject in the image provided by CAMPBELL. Moments after the vehicle was seen by agents, CAMPBELL told the UC that he had arrived.

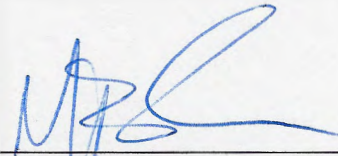
14. After CAMPBELL confirmed that he was at the predetermined location, agents contacted CAMPBELL in the parking lot. CAMPBELL matched the physical likeness of the image provided to the UC and CAMPBELL was arrested. At the time of CAMPBELL's arrest, CAMPBELL was in possession of two condoms and \$652.00 cash.

15. Two cellphones were located in the cab of the pickup. Both phones were open, displaying the contents of the phones. One of the phones was displaying a text message with a contact titled "15" and the name of the UC was in the visible body of the message. The UC called the account to which the UC had been communicating, and the same phone rang with the contact saved as "15".



16. Based on the information above, I have probable cause to believe that Ervin Joe CAMPBELL violated Title 18, United States Code, Section 2422(b) that is,

Attempted Enticement of a Minor, in the Abilene Division of the Northern District of Texas, and respectfully ask that this Court issue a criminal complaint and arrest warrant for him.



Special Agent Michael H. Baker
Homeland Security Investigations

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41 (d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the affiant under oath, and the affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the affiant, that the document received by me is a correct and complete copy of the document submitted by the affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the affiant's knowledge.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 26th day of February 2026.



Honorable John R. Parker
United States Magistrate Judge