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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

PARKER WILLIAM WHITE,
aka "panda4985,"
aka "panda16801@gmail.com,"

Defendant.

ED CR No. 23-00040(A)-AB

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. §§ 2251(a), (e):
Production of Child Pornography;
18 U.S.C. §§ 2252A(a) (2) (B),
(b) (1): Receipt of Child
Pornography; 18 U.S.C.
§§ 2252A(a) (5) (B), (b) (2):
Possession of Child Pornography;
18 U.S.C. §§ 2253 and 2428:
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2251(a), (e)]

On or about November 24, 2021, in San Bernardino County, within
the Central District of California, and elsewhere, defendant PARKER
WILLIAM WHITE, also known as ("aka") "panda4985," aka
"panda16801@gmail.com," knowingly employed, used, persuaded, induced,
enticed, and coerced a minor, who was then fourteen years old, to
engage in sexually explicit conduct, as defined in Title 18, United

1 States Code, Section 2256(2) (A), for the purpose of producing a
2 visual depiction of such conduct, which visual depiction was produced
3 using materials that had been mailed, shipped, and transported in and
4 affecting interstate and foreign commerce.

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COUNT TWO

[18 U.S.C. §§ 2252A(a)(2)(B), (b)(1)]

On or about October 12, 2021, in San Bernardino County, within the Central District of California, defendant PARKER WILLIAM WHITE, also known as ("aka") "panda4985," aka "panda16801@gmail.com," knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been produced using materials that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant PARKER received consisted of a video titled

"b~EiQSFVl1lOExGS1BwSVM0YzhzV2xtY2tQeBoAGgAyAX1IALAEYAE."

COUNT THREE

[18 U.S.C. §§ 2252A(a)(2)(B), (b)(1)]

On or about January 7, 2022, in San Bernardino County, within the Central District of California, defendant PARKER WILLIAM WHITE, also known as ("aka") "panda4985," aka "panda16801@gmail.com," knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been produced using materials that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant PARKER received consisted of a video titled

"b~EiQSFWZJN3lxcHlFdkJpVktTNFhrUk42RBoAGgAyAQRIAlAEYAE."

COUNT FOUR

[18 U.S.C. §§ 2252A(a)(2)(B), (b)(1)]

On or about January 8, 2022, in San Bernardino County, within the Central District of California, defendant PARKER WILLIAM WHITE, also known as ("aka") "panda4985," aka "panda16801@gmail.com," knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been produced using materials that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant PARKER received consisted of a video titled

"b~EiQSFUhuM3lIS1VZSWhSNGxCTW00ZENaaxoAGgAyAQRIAlAEYAE."

COUNT FIVE

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

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3 On or about January 27, 2022, in San Bernardino County, within
4 the Central District of California, defendant PARKER WILLIAM WHITE,
5 also known as ("aka") "panda4985," aka "panda16801@gmail.com,"
6 knowingly possessed a black/grey iPhone 12 Pro Max, Model MG923LL/A,
7 bearing IMEI No. 354876506002091, and bearing Serial No. F2LF69170D43
8 (the "iPhone"), that contained at least one image of child
9 pornography, as defined in Title 18, United States Code, Section
10 2256(8)(A), that had been produced using materials that had been
11 mailed, shipped, and transported in and affecting interstate commerce
12 by any means, including by computer, knowing that the images were
13 child pornography.

14 The child pornography that defendant WHITE possessed on the
15 iPhone consisted of:

- 16 1. a video titled "IMG_3999.MP4";
 - 17 2. a photograph titled "IMG_3999.JPG"; and
 - 18 3. a video titled "IMG_4001.MP4."
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FORFEITURE ALLEGATION ONE

[18 U.S.C. § 2253]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 2253, in the event of the defendant's
7 conviction of the offenses set forth in and of Counts One through
8 Five of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following property:

11 (a) All right, title, and interest in any visual depiction
12 involved in any such offense, or any book, magazine, periodical, film
13 videotape, or other matter which contains any such visual depiction,
14 which was produced, transported, mailed, shipped or received and
15 involved in such offense;

16 (b) All right, title, and interest in any property, real
17 or personal, constituting or traceable to gross profits or other
18 proceeds obtained from such offense;

19 (c) All right, title, and interest in any property, real
20 or personal, used or intended to be used to commit or to promote the
21 commission of such offense or any property traceable to such
22 property; and

23 (d) To the extent such property is not available for
24 forfeiture, a sum of money equal to the total value of the property
25 described in subparagraphs (a), (b), and (c).

26 3. Pursuant to Title 21, United States Code, Section 853(p),
27 as incorporated by Title 18, United States Code, Section 2253(b), the
28 defendant, if so convicted, shall forfeit substitute property, up to

1 the total value of the property described in the preceding paragraph
2 if, as the result of any act or omission of the defendant, the
3 property described in the preceding paragraph, or any portion
4 thereof: (a) cannot be located upon the exercise of due diligence;
5 (b) has been transferred, sold to or deposited with a third party;
6 (c) has been placed beyond the jurisdiction of the court; (d) has
7 been substantially diminished in value; or (e) has been commingled
8 with other property that cannot be divided without difficulty.

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FORFEITURE ALLEGATION TWO

[18 U.S.C. § 2428]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 2428, in the event of the defendant's
7 conviction of the offenses set forth in and of Counts One through
8 Five of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following property:

11 (a) All right, title, and interest in any property, real
12 or personal, that was used or intended to be used to commit or to
13 facilitate the commission of such offense;

14 (b) All right, title, and interest in any property, real
15 or personal, constituting or derived from any proceeds obtained
16 directly or indirectly from such offense; and

17 (c) To the extent such property is not available for
18 forfeiture, a sum of money equal to the total value of the property
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),
21 as incorporated by Title 18 Section 2428(b)(2), the defendant, if so
22 convicted, shall forfeit substitute property, up to the total value
23 of the property described in the preceding paragraph if, as the
24 result of any act or omission of the defendant, the property
25 described in the preceding paragraph, or any portion thereof: (a)
26 cannot be located upon the exercise of due diligence; (b) has been
27 transferred, sold to or deposited with a third party; (c) has been
28 placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5 /s/

6
7 Foreperson

8 E. MARTIN ESTRADA
9 United States Attorney

10 

11 *Scott M. Garringer*
12 *Deputy Chief, Criminal Division For:*

13 MACK E. JENKINS
14 Assistant United States Attorney
15 Chief, Criminal Division

16 JOSHUA O. MAUSNER
17 Assistant United States Attorney
18 Chief, Violent & Organized Crime
19 Section

20 LYNSI ALLSOP
21 Assistant United States Attorney
22 Violent & Organized Crime Section
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