

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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,"

Defendant.

ED CR 5:23-cr-00040-AB

I N D I C T M E N T

[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:

[18 U.S.C. §§ 2252A(a) (5) (B), (b) (2)]

On or about January 27, 2022, in San Bernardino County, within the Central District of California, defendant PARKER WILLIAM WHITE, also known as "panda4985," knowingly possessed a black/grey iPhone 12 Pro Max, Model MG923LL/A, bearing IMEI No. 354876506002091, and bearing Serial No. F2LF69170D43 (the "iPhone"), that contained at least one image of 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.

1 The child pornography that defendant WHITE possessed on the
2 iPhone included, but was not limited to:

- 3 1. a video titled "IMG_3999.MP4";
- 4 2. a photograph titled "IMG_3999.JPG"; and
- 5 3. a video titled "IMG_4001.MP4".

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 2253]

1
2
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 offense set forth in this Indictment.

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

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

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

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

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

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

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

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 2428]

1
2
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 offense set forth in this Indictment.

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

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

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

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


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

1 other property that cannot be divided without difficulty.

2
3 A TRUE BILL

4
5 /s/
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
*Scott M. Garringer
Deputy Chief, Criminal Division For:*

10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division

13 JEFFREY M. CHEMERINSKY
14 Assistant United States Attorney
15 Chief, Violent & Organized Crime
16 Section

17 LYNSI ALLSOP
18 Assistant United States Attorney
19 Violent & Organized Crime Section
20
21
22
23
24
25
26
27
28