AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America
v.

JESSE WHITE

Case No. 1:26-MC- 000050

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 the date(s) of July 21, 2026 in the county of Cumberland in the Middle District of Pennsylvania, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 2252A(a)(2)	Receipt and distribution of child pronography
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography

This criminal complaint is based on these facts:

I, Alyssa Alliger, being first duly sworn, hereby depose and state as follows:

☑ Continued on the attached sheet.

Complainant's signature

SA, Alyssa Alliger - FBI
Printed name and title

Sworn to telephonically and signed electronically by me.

Date: 07/21/2026

Judge's signature

City and state: Harrisburg, Pennsylvania

Susan E. Schwab, U.S. Magistrate Judge
Printed name and title

CONTINUATION SHEETS IN SUPPORT OF A CRIMINAL COMPLAINT

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Capital Area Resident Agency office located in York, Pennsylvania. I have been employed as a Special Agent with the FBI since 2021.

2. I am currently assigned to investigate crimes against children including, but not limited to, child exploitation and child pornography offenses in violation of Title 18, United States Code, Sections 2251, 2252/2252A, 2422, and 2423. Additionally, I have been involved with investigations of violations of other federal statutes including Hobbs Act extortion, fraud, violent crime, online sexual exploitation, and kidnapping. As a Special Agent, one of my primary duties is the enforcement of federal laws and the security of government witnesses and entities identified during the course of these investigations. I have been trained in conducting child exploitation investigations using digital and electronic techniques. I have had the opportunity to review numerous examples of digital evidence, conduct interviews with subjects, witnesses and victims, participated in the

execution of many search warrants involving child exploitation and enticement offenses and have reviewed thousands of images of illegal child sexual abuse material related to these investigations.

3. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

4. The statements in these continuation pages are based on my personal investigation and information provided by other law enforcement officers. These statements are intended to show only that there is sufficient probable cause for the criminal complaint and do not set forth all of my knowledge about this matter. I have set forth only the facts that I believe are necessary to establish probable cause that Jesse White, [redacted], violated Title 18, United States Code, Sections 2252(a)(2) (receipt and distribution of child pornography), and 2252A(a)(5)(B) (possession of child pornography).

LEGAL AUTHORITY

5. This criminal complaint concerns violations of the following federal criminal statutes:

A. 18 U.S.C. § 2252A(a)(2) and (b)(1) prohibit a person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any child pornography or any matter than contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

B. 18 U.S.C. §2252A(a)(5)(B) prohibits anyone from knowingly possessing material that contains child pornography.

TECHNICAL TERMS AND DEFINITIONS

6. Based on my training and experience, I use the following technical terms and definitions to convey the following meanings:

A. "Child Pornography," as used herein, includes the definition in Title 18 U.S.C. § 2256(8) (any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual

depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct), as well as any visual depiction, the production of which involves the use of a minor engaged in sexually explicit conduct (see Title 18 U.S.C. §§ 2252 and 2256(2)).

B. The term "minor", as used herein, is defined pursuant to Title 18, United States Code, Section 2256(1) as "any person under the age of eighteen years."

C. "Sexually explicit conduct" means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any persons. (See Title 18 U.S.C. § 2256(2)).

D. "Visual depictions" include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual image. (See Title 18 U.S.C. § 2256(5)).

PROBABLE CAUSE

7. The National Center for Missing and Exploited Children (NCMEC) receives complaints via their Cybertipline from Internet Service Providers (ISPs), Electronic Service Providers (ESPs), and others. These Cybertipline reports are reviewed by a NCMEC analyst and forwarded to law enforcement for further investigation based on the information provided in the Cyber Tipline report.

8. On or about July 20, 2026, FBI CARA received NCMEC Cybertipline Report number 246509293. The report was received by NCMEC on June 19, 2026. It was flagged as "child pornography possession, distribution, manufacture". Further, this report was flagged for files that appear unfamiliar and may depict new produced and/or homemade content.

9. According to the Cybertipline Report 246509293, the subject was identified as follows:

Name: Jesse White

Mobile Phone: [redacted] (Verified 12-17-2025 23:59:03 UTC)

Date of Birth: [redacted]

Email Address: [redacted] (Verified)

Email Address: [redacted]

10. According to the Cybertipline Report, Google LLC., submitted an image associated with this report. Specifically, the file Google submitted was labeled Google-CT-RPT-246509293-368b55e92dbccb0b9f428d3e6e4f6d4c-IMG_0648.HEIC.

11. I viewed file Google-CT-RPT-246509293-368b55e92dbccb0b9f428d3e6e4f6d4c-IMG_0648.HEIC. The file depicts a prepubescent minor male child, approximately 5-6 years of age, fully nude in the shower. The child is seen with one hand holding his penis. There is a reflection of an adult male visible in the photo. The adult male appears to be a white male subject, holding his phone taking the picture. The subject appears to be wearing a ring in this reflection.

12. The metadata associated with this file indicates that an Apple iPhone was utilized to produce this image in January 2019.

13. In addition, a second Cybertipline Report was submitted associated with this subject. The second Cybertipline Report is 246571621.

14. The second Cybertipline Report identified file "Google-CT-RPT-246571621-4dc5c0ada23f36d0dbceffda915513ef-IMG_5946.HEIC," which was described as depicting a naked prepubescent male pressing his buttocks against a window.

15. The metadata associated with this file indicates that an Apple iPhone was utilized to produce this image in August 2021.

16. Jesse White has two minor male children.

17. [redacted]

18. Based upon the images of [redacted] that I viewed on social media, it is estimated that the minor who appears in the images flagged by Google and which are the subject of the Cybertipline Reports is 9-11 years old.

19. After receiving the NCMEC Cybertip Reports, I learned that Jesse White had or has accounts with ProtonMail as well as encrypted applications like Telegram.

20. Based on my training and experience, I know that encrypted applications like Telegram and ProtonMail are utilized for anonymity and because of their enhanced security and encryption features. I know from my training and experience that individuals engaged in child exploitation use ProtonMail to communicate securely and anonymously with other individuals interested in or engaged in child exploitation activities. I also know from my training and experience that individuals engaged in child exploitation favor ProtonMail not only because of its encryption and security, but because they believe that ProtonMail (which is based in Switzerland) will not comply with U.S.-based legal process.

21. On July 21, 2026, the FBI executed a federal search warrant at Jesse White's residence at 1831 Vista Drive, Mechanicsburg, Pennsylvania 17055. During the execution of the search warrant, FBI agents seized multiple computers and hard drives and conducted a preliminary on-site review of the devices.

22. In Jesse White's home office, agents seized two laptops and multiple external hard drives. One of the laptops, a Lenovo, had a 20-terabyte external hard drive mounted to it, which was found to contain numerous files containing images of child pornography depicting minors between the estimated ages of seven to 15 years old engaged in sexually explicit activity. Agents observed that the titles of some of the files identified the ages of the minors depicted in the child pornography.

23. In a separate drive, identified as the "Z" drive on the Lenovo laptop computer, agents found approximately 100 files depicting child pornography. Based on a preliminary review of this material, it appears the hard drive was organized by categories of child pornography depicted in the files.

24. For example, one video file depicted two minor females, approximately 10-to-13 years old fully nude in the shower, with one of the minor females performing oral sex on the other minor female. Another file is a still photograph that depicts a minor female approximately 8-to-10 years old with her legs over her head, exposing her genitals.

25. Agents also seized an Apple laptop computer with an account labeled "Jesse White," which contained an image of a minor female approximately 12-to-14 years old kneeling with her genitals exposed.

26. After being Mirandized, Jesse White spoke voluntarily with the agents during the execution of the search warrant. White told the agents that he had used Telegram, Qbittorrent (commonly referred to as "Bit Torrent," which a peer-to-peer file sharing program), and the Tor browser to access the "dark" web. White admitted that while using Telegram, Qbittorrent, and while on the Tor browser he accessed what he referred to as "inappropriate content." In response to further questioning, White confirmed that what he meant by "inappropriate content" was child pornography. White also admitted that the devices the agents seized during the execution of the search warrant would contain child pornography.

27. [redacted]

CONCLUSION

28. Based on the foregoing information, I submit that there is probable cause that Jesse White received child pornography on an as-yet unconfirmed date, in violation of 18 U.S.C. § 2252(a)(2), and that he possessed child pornography on or about July 21, 2026, in violation of 18 U.S.C. § 2252A(a)(5)(B).