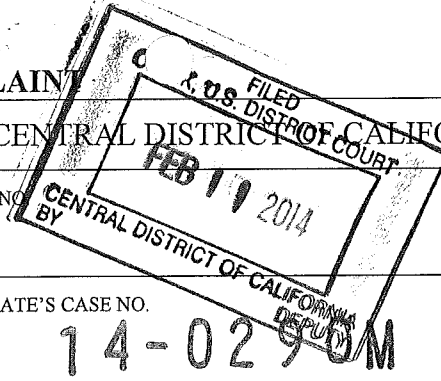


## CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. JASON WHITE		DOCKET NO.	 A stamp from the Central District of California, dated FEB 11 2014, with the text 'FILED', 'U.S. DISTRICT COURT', and 'CENTRAL DISTRICT OF CALIFORNIA'. Below it is a handwritten case number '14-0290M'.
		MAGISTRATE'S CASE NO.	
Complaint for violation of Title 18, United States Code, Section 2261A(2)(A) (Stalking)			
NAME OF MAGISTRATE JUDGE HONORABLE ANDREW J. WISTRICH		UNITED STATES MAGISTRATE JUDGE	LOCATION Los Angeles, California
DATE OF OFFENSE September 23, 2013	PLACE OF OFFENSE Los Angeles County	ADDRESS OF ACCUSED (IF KNOWN)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:			
<p style="text-align: center;">[18. U.S.C. § 2261A(2)(A)]</p> <p>Beginning on or about September 23, 2013, and continuing to on or about February 11, 2014, in Los Angeles and Riverside counties, within the Central District of California, and elsewhere, defendant JASON WHITE, with the intent to harass and intimidate, and to cause substantial emotional distress, fear of death and bodily injury to a person, and fear of death and bodily injury to immediate family members of a person, identified herein as A.S., used facilities of interstate commerce, including cellular telephone networks, electronic mail, interstate wires, and the Internet, to engage in a course of conduct that placed A.S. in reasonable fear of the death or serious bodily injury of A.S. and an immediate family member of A.S, and caused and would reasonably be expected to cause substantial emotional distress to A.S. and an immediate family member of A.S.</p>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:			
(See attached affidavit which is incorporated as part of this Complaint)			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT <b>ELIZABETH RIVAS</b>		
	OFFICIAL TITLE Special Agent – Federal Bureau of Investigation (FBI)		
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE <sup>(1)</sup>  ANDREW J. WISTRICH			DATE February 11, 2014

<sup>(1)</sup> See Federal Rules of Criminal Procedure 3 and 54

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, ELIZABETH RIVAS, being duly sworn, hereby state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") for the Federal Bureau of Investigation ("FBI") and have served in that capacity for more than sixteen years. I am currently assigned to the Los Angeles Office, Violent Crime Squad. My current responsibility involves the investigation of violent crimes including extortions, threats and interstate stalking violations. During my employment with the FBI, I have participated in investigations involving public corruption, bribery, fraud against the government, health care fraud, fuel tax evasion, bank and loan fraud, wire fraud, mail fraud, social security fraud, marriage fraud, narcotics trafficking, money laundering, and material support of terrorism. I have also participated in the execution of numerous search and arrests warrants. I have conducted physical surveillance and have monitored electronic surveillance. The opinions I have formed and set forth in this affidavit are based on my experience and training, as well as my consultation with other experienced investigators and agents of the FBI. This affidavit is made in support of a criminal complaint and warrant for the arrest of JASON WHITE ("WHITE") for a violation of Title 18, United States Code, Section 2261A(2)(A) (Stalking).

## II. SUMMARY OF APPLICABLE FEDERAL STATUTES

2. Title 18, United States Code, Section 2261A(2) (A) provides, in pertinent part:

Whoever -

With the intent to kill, injure, harass, intimidate, or place under surveillance. . .uses. . .any interactive computer service or electronic communication service or electronic communication service of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that

(a) places that person in reasonable fear of the death or serious bodily injury [of that person, their spouse, or immediate family member]; or

(b) causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to [such a person]

Shall be punished [as provided in this Title].

## III. SUMMARY OF EXTORTION AND STALKING SCHEME

3. The FBI is currently investigating allegations of extortion and stalking involving WHITE and multiple victims including two artists and their family members, an art publisher, the publisher's clients, and the publisher's employees. Based on the evidence gathered in this investigation, WHITE held himself out as a successful art dealer and obtained employment with an art publisher, claiming that he could sell the artist's works. At some point, the employment relationship deteriorated, and WHITE began making threats against his former employer, the art publisher. WHITE created internet domain names and addresses in the name of the former employer, where he would make derogatory

allegations against the publisher and the artist (claiming, for example, that the publisher was distributing forgeries). WHITE then sent threatening text messages and emails to the publisher and other individuals, demanding a fee in order to take the websites down. Because the domain names contained the names of the victims, WHITE warned that any internet search for the victims' names would turn up WHITE's websites and spread his derogatory statements. WHITE also sent derogatory emails to some of the publisher's most important clients, and went on to threaten the reputation of those clients by threatening to report their involvement in the distribution of forged artwork to various newspapers.

4. When his demands were not met, WHITE's messages became more threatening, ultimately threatening physical violence. WHITE claimed to know where the victims lived and sent some victims pictures of their own children, noting that he knew the children's names and where they lived. WHITE made it clear that he was prepared to harm the victims and their children and that he was willing to go to jail. The extortion and threats began on or about September of 2013 and are continuing to the present date.

5. The emails and text messages summarized and quoted in this affidavit were obtained from the victims or summarized by the victims in this case, as noted below. In addition, I have

interviewed victims R.B., A.S., and T.G., and have summarized information provided by these victims in this affidavit.

6. WHITE holds a North Dakota driver's license and has a 2001 conviction for possession of a controlled substance and a 2010 conviction for possession of a controlled substance and unlawful possession of a weapon. He also has a 2005 misdemeanor fraud conviction.

7. The facts set forth in this affidavit are based upon 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 complaint and warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**SCHEME TARGETING R.B. FINE ART IN LOS ANGELES, CALIFORNIA**

**A. WHITE's Employment at R.B. Fine Art**

8. Based on my discussions with victim R.B., I learned that R.B. is an art publisher ("victim R.B." or "R.B.") representing artist F.P. ("victim artist"). Victim R.B. owns R.B. Fine Art located in Los Angeles, California. The victim artist's original paintings and limited edition reproductions are sold at galleries in the United States and around the world.

9. In approximately April of 2013, WHITE was hired as an independent contractor/salesman at R.B. Fine Art. Prior to being hired, WHITE represented himself to victim R.B. as a successful salesman and the owner and director of the Fargo Gallery in North Dakota. WHITE relocated to Los Angeles, California for the position and represented that he had many clients. WHITE was paid a bi-weekly salary and a sales commission. WHITE requested that all of his paychecks be made payable to the Fargo Gallery in North Dakota.

10. After WHITE was hired, it became clear to victim R.B. that WHITE did not have the connections he claimed. WHITE sold some of victim artist F.P.'s artwork, but he never sold enough to exceed his base salary. A.S. was WHITE's boss at R.B. Fine Art ("victim A.S." or "A.S."), and, according to victim A.S., WHITE and A.S. had disagreements at work. Victims R.B. and A.S. told me that they grew concerned about how WHITE was representing their business and the victim artist. According to victims R.B. and A.S., WHITE had financial problems and had difficulty taking constructive criticism or direction from victim A.S.

11. On August 15, 2013, WHITE and victim A.S. had an argument at work. Later that evening, at approximately 7:20 p.m., from his internal office email account, WHITE sent victim R.B. an email message titled, "My position with your company." In the email message, WHITE said that he was not happy with the working conditions and his relationship with victim A.S. WHITE

indicated that WHITE should move on and would be contacting other galleries for a position. When he left that evening, WHITE took all of his belongings from his office. Victim R.B. later responded by email saying that he was sorry that things did not work out and offered to provide WHITE with an employment reference.

**B. Initial Threats to R.B.**

12. On August 23, 2013, WHITE sent victim R.B. an email from robertbanedisclosurestatement@gmail.com. ("SUBJECT EMAIL ACCOUNT 1") and signed it as coming from the "Fargo Gallery." In the email, WHITE stated that the Fargo Gallery was based in North Dakota. WHITE claimed that the Fargo Gallery had invested time and money in the victim artist, and had been mistreated and robbed of future income. The email contained allegations about the authenticity of the victim artist's works. The email stated: "A person with nothing left to lose becomes a very powerful thing." In the email, WHITE went on to identify two internet websites he had created using the victim artist's name in the website address. WHITE went on to ask, "what if a very savvy internet person owned [the two websites using the artist's name] and felt very jaded at RBFA?" The email demanded that R.B. enter into a "non-disclosure agreement" and pay Fargo Gallery a \$150,000 consulting fee. The email said that this offer would only be good for the next three days and would then go up to

\$300,000. The email warned that non-compliance would result in "things that may not be undone."

a. Records obtained from the domain service provider for the two websites using the victim's name show that both domain names were created and registered by WHITE. The first was created in March of 2013.

13. On August 27, 2013, WHITE sent an email from SUBJECT EMAIL ACCOUNT 1 to victim R.B.'s largest client, an art distributor located in the United Kingdom ("U.K. Distributor"). The email was from the "Fargo Gallery LLC Agent" and contained allegations of fraud associated with victim artist F.P.'s works. The sender requested that the U.K. Distributor, Fargo Gallery, and victim R.B. sign a non-disclosure agreement. Fargo Gallery requested a 300,000 consulting fee (the currency was not specified). The email threatened, "We will be contacting the London newspapers at 3pm today/PST. This contacting of large establishments will continue unless an agreement can be made. Please only reply to this email. We will check it today at 2. If we see no reply this will escalate...." The U.K. Distributor received another email from WHITE on September 3, 2013. This email, sent from email address perezfineart@gmail.com ("SUBJECT EMAIL ACCOUNT 2"), alleged that R.B. and the victim artist were engaged in international fraud.



a. The emails sent from WHITE to the U.K. Distributor originated with WHITE (who resided in California at the time) and were received by the U.K. Distributor in London, England.

b. Victim R.B. reported to me that the U.K. Distributor owns approximately 42 galleries in the United Kingdom and is the largest fine art publisher in the United Kingdom. Victim R.B. and the U.K. Distributor have had a business relationship for more than eight years. The U.K. Distributor purchases approximately 80% of the victim artist's work.

14. On September 5, 2013, WHITE, using SUBJECT EMAIL ACCOUNT 1, sent an email message to victim R.B. The email stated, in part:

OH RB, This will be enjoyable. Today will be a fun day. Keep ignoring us! Let that ego and pride get mad at us and once again diminish our value....Either way we will complete our goal. People/galleries will know. They will believe just like Ives..we feel we speak the truth. You are shady and this will be an easy thing to believe...We are a young version of you, but honest. We are going to keep up the good word of [Victim Artist's F.P.'s first name] Fraud [sic] until your done. This is my court and I will put you out of the game. Keep ignoring us and let this get big and ruin shit. We played this with [another victim] and after they fucked our fam [sic] biz [sic] we asked for 100K. After a year and much bad Internet PR [sic] they gave us 80K. So they got screwed on the World Wide Web and maybe lost some clients. And were so stupid, they waited a year, let all this happen and then still paid. Next is the contacting of you [sic] way bigger accounts. Contacting every email I ever sent, unravelling [sic] the work. The websites will be up and more visible...bringing 150 hits A DAY [sic]...I'm sure you can tell yourself I'm powerless and this means nothing. Keep up that lie and watch!!!!!! Take Care

15. Beginning on September 6, 2013, WHITE, using SUBJECT EMAIL ACCOUNT 2, began sending several email messages to victim R.B.'s clients titled "[victim artist] Fraud" with allegations that victim R.B. was running a "sweatshop" and that the victim artist's works were forged or fraudulent.

16. On September 8, 2013, WHITE, using SUBJECT EMAIL ACCOUNT 2, sent victim R.B. an email with the subject line, "Look." The email stated:

Would you really like us to continue with this?... You should sign a nondisclosure statement with our company. We will need to be paid a reasonable fair figure for our time.... We would be willing to discuss this and we may be reasonable. But \$1,500 and a take care will not cut it asshole... And in about four hours I will be sending mass emails out to everybody. No phone call or voicemail in a friendly caring voice will solve this. You will need to get your pen out and email us. When it's too late... it's too late on this one.

**C. Threatening and Harassing Text Messages and Emails to R.B., R.B.'s Son, and R.B.'s Employees**

17. Beginning in September of 2013, WHITE also began sending text messages to victim R.B., victim A.S. (WHITE's boss at R.B. Fine Art), R.B.'s son, and other employees at R.B. Fine Art, at all hours of the day and night, from cellular telephone (310) 744-XXXX ("SUBJECT TELEPHONE")<sup>1</sup>. In the text messages, WHITE often included photographs of himself. The following are

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<sup>1</sup> My investigation revealed that SUBJECT TELEPHONE is registered to WHITE. Also, several of the victims know this number to belong to WHITE based on their contact with him when WHITE was employed at R.B. Fine Art. All text messages attributed to WHITE in this affidavit were sent from the SUBJECT TELEPHONE.

some examples of the messages WHITE sent to the victims from the SUBJECT TELEPHONE.

18. On or about September 23, 2013, at approximately 9:45 p.m., WHITE sent a text message to R.B.'s son, referring to one of the websites WHITE had created, stating it was for sale for \$300,000, and saying "ur so fucked!!!"

19. On or about September 23, 2013, at approximately 11:03 p.m., WHITE sent a text message to victim R.B., R.B.'s son, and victim A.S. on their cellular telephones. Part of the text included, "I am now guarding you. This is now a pick up game. I will break you down and take you out of the game. This shit just got real..... And your ego will hang on this one. More bombs will drop tomorrow you crooked piece of shit!"

20. On or about September 23, 2013, at approximately 11:35 p.m. and 11:36 p.m., WHITE sent text messages to R.B., R.B.'s son, and A.S. on their cellular telephones. The texts stated<sup>2</sup>, in part:

You have a very small window once again assholes. The figure will be high but we could lend our time and sign a nondisclosure agreement with R.B. fine art [sic]. I am about to fuck you up. I have done this before dickhead!!!!!!!!!!!!. [Victim] paid me \$80k thousand and I liked them. I know what to do and you are fucked. I have danced this dance before with lawyers and Internet

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<sup>2</sup> In this case, WHITE often sent a series of continuous text messages, without receiving any response from the victims. Therefore, in this affidavit, a string of separate text messages sent in close proximity to one another may be grouped together for clarity and efficiency. In some instances, R.B.'s son responded to the texts, but those responses have not been included in the affidavit.

companies and such. I have played this out motherfucker!!!!!! You will not be able to do shit but lose your multimillion dollar account or go to jail. Or both!! And I have been growing much stronger like a fucking Jedi...I am definitely in the art game and once again I have stated, it is my goal to take you out. Your ball bro.

21. On or about September 23, 2013, at approximately 12:09 a.m., WHITE sent text messages to R.B., R.B.'s son, and A.S. The texts stated, in part:

This has become a simple sale of a domain. Will get [sic] [the website using victim artist's name] for \$300,000. Fargo Gallery LLC is running a special. You may purchase [the website using victim artist's name] for one dollar with the purchase of file [a second website using victim artist's name] for the figure stated above. As a comp [sic] we will have our agent sign a nondisclosure statement with your company about all events and happening [sic]. I now have money and the family lawyers waiting in the wings....Fuck you!

22. On or about September 24, 2013, at approximately 1:33 a.m., WHITE sent a text message R.B.'s son. The message stated, in part,

You understand that you and your dad's company are fucked, don't you [sic] I am a ruthless motherfucker and actually bro I've been to the joint. I've had to fight for my life. My habit, it got kind of bad once, I've been shot at and had knives to my throat. I am way [sic] steps ahead of you and your stupid greedy father.

23. On or about September 24, 2013, between 4:35 a.m. and 4:37 a.m., WHITE sent text messages to R.B.'s son. The text messages stated, in part:

I am doing everything I can not to go after England and all the information I know...[The U.K. Distributor] Fine Art bitch...So I'm not finished this [sic] beer and taking a bong hit. Waiting for your dad to reply about

the transfer of domains in [sic] the money and that is it. I'm sure you [sic] dad will not reply so that means I have a big day tomorrow on the Internet I better get some sleep you little stupid loser... Emails are being sent. Ask your father they have been carbon copied it is about to get worse...Those websites are live on the Internet you stupid fuck...And the beauty is I can just do some simple marketing and said[sic] back and due ti [sic] the content lettering of the URL that matches father and P.'s [victim Artist's F.P.'s Last Name] name it will show up all over the globe on search engines.

24. On or about September 24, 2013, between 9:26 a.m. and 11:00 a.m., WHITE sent text messages to R.B, R.B.'s son, and A.S. The text messages, in part, stated:

And the beauty is [victim R.B.], I bought these domain names before I even work [sic] for you. I was planning this for a long time and while I was working for you I was getting all the information I need to bring you down. I paid \$10 for each one of these domains and look what it's about to do!!!!!!! Kinda makes you want to rethink about how you fuck people over....So let me know [victim R.B.], I am having coffee and then will pick all your real big accounts today, ...[U.K. Distributor]..... At this time I am allowing you to call me [victim R.B.]. I am not scared of you at all but don't want to speak to you why [sic] I gathered the situation that would end up chopping off your head. I now have you in checkmate. Your call should only be about the transfer of funds for the purchase of said domains. I await your call you fucking prick.

25. On or about September 24, 2013, at approximately 4:00 p.m., WHITE sent a text messages to R.B., R.B.'s son, and A.S. The text messages included, "The globe [sic] in London will be emailed by me also... You are so fucked!!!!!! In fact I'm calling the LA times [sic] right now...setting up my interview with editor [sic] And I have just contacted the editor of the Huffington Post!!!!!!"

26. On or about September 25, 2013, at approximately 8:05 a.m., WHITE sent a text message to R.B, R.B.'s son, and A.S. The text stated, in part:

Good morning Dick heads [sic]! The figure is now \$335,000 And [sic] now I have just spoken to the LA Times!!! They seem interested!!!! I hope you're listening to me dumb bitch [victim A.S.'s first name]. Is she sitting back and telling you that nothing will happen and I can't do anything and that I'm crazy ?????!! because that bitch is about to lead you down a path that you cannot return from asshole. Hey you are right this wholesale side is a tough game!!!! I'm sorry you just got fucked and you're about to lose the game!!!

27. On September 25, 2013, at approximately 8:59 a.m., WHITE, using SUBJECT EMAIL ACCOUNT 1, sent an email message to the U.K. Distributor in the United Kingdom. The email stated, in part:

We suggest you distance yourself from [victim R.B.]. The bastard is going down. We highly suggest that somebody buy two domains from us.... The figure is 325,000. Going up 10000 a day! We are contacting the LA times [sic] now... and the London globe [sic] right after that.. You may be part of international fraud. Did your royal company know of this fraud..."

28. On or about October 16, 2013, WHITE sent a text message to victims R.B. and A.S. In the message, WHITE said that he was sitting back and letting the "hits" pile up (referring to "hits" on the websites he created), and that he was now focusing on the U.K. The text included, "This will stop when you pay. Buy the domains or loose[sic] so much more over time.... Do you have my number [SUBJECT TELEPHONE]."

29. On December 17, 2013, WHITE, using fargogallery@gmail.com ("SUBJECT EMAIL ACCOUNT 3"), sent an email message to the victim artist F.P. directly. The sender is identified as "Gallery Director, Jason White." The email stated, in part:

Are you guys really gonna[sic] let these domains and statements stay on the net???? [Victim R.B.] won't acknowledge it cuz [sic] his ego. I was the dumb kid they all felt smarter than. It's their rodeo sense of fucked upness [sic]. They will make you but then destroy your career at about 45-48... Bro, I do what [Victim R.B.'s last name] does. I'm the management for people you respect. I own a gallery now too.. [Victim R.B.'s last name] has fucked you out of a possible chain of galleries...So buy the domains personally. Protect yourself. I'm the man now. I take less of a cut. Let me rep [sic] your work while you are hot... [Victim R.B.'s last name] will sink you. It's what he does! I want 10k.

30. On December 17, 2013, WHITE, using whitepublications@gmail.com ("SUBJECT EMAIL ACCOUNT 4"), sent an email to one of victim R.B.'s clients in Hawaii asking if the client was part of the "fraud" involving artist F.P.'s works. The email threatened that this client would now be listed on the "Rip Off Report." On the same day, WHITE, using SUBJECT EMAIL ACCOUNT 2, sent a similar email to another one of victim R.B.'s clients in North Carolina.

**D. Threats Become More Violent and Target Victim A.S. and A.S.'s Minor Children**

31. On or about January 5, 2014, at approximately 9:00 a.m., WHITE sent text messages to victim R.B., R.B.'s son, and victim A.S. The texts stated, in part (emphasis added):

All bets are off and I will keep this up and take this way outside the box. I might just go straight cape fear on your asses... [victim A.S.'s first name]! can you hear me??? Manhattan Beach is on a map right?... You didn't think this would all happen... Did ya [sic] bitch? Kinda surprised ya? Well act tuff [sic] and just wait. I have a few more wild surprises.. In a bit... After I get the slander suit.. I'm going cape fear [Victim A.S.'s first name] One of these nights I'll have the parking spot next to you at the store. [victim A.S.'s first name] have you seen my police record??????? Cuz [sic] when I see you or your family... I'll be saying hi... I bet if I start hanging on the beaches [sic]... I might run into b [Victim A.S.'s minor child's first name] someday. I know you have tried to destroy my life.. no biggie [sic]. I'm sure someday b [Victim A.S.'s minor child's first name] and I will be cool... I can't wait to see him randomly... On the beach... "One of these nights I'll have the parking spot next to you at the store [Victim A.S.'s first name] have you seen my police record??? Cuz [sic] when I see you and your family... I'll be saying hi.. A man who is not afraid of jail and has nothing left to loose [sic] becomes a very powerful thing. I'd truly start thinking about your families at this moment... After this slander.. Well you will pay some way. It could have been cash. Now you will pay with fear, anguish and pain...

a. Victim A.S. lives in the Manhattan Beach area. I also know that "Cape Fear" is a well-known movie about a murderer and rapist who viciously stalks and attacks a family.

32. On January 5, 2014, at 12:25 p.m., WHITE sent an email from SUBJECT EMAIL ACCOUNT 3 to victim A.S. with the title, "Got ur [sic] name bitch!" In this message, WHITE stated that he had created a website using victim A.S.'s name and that "Tell [sic] the end of time I will keep this domain and when anybody needs to research [victim A.S.] or your children they will find this and what I have posted.... Fuck you!"



a. According to records from the domain service provider for the website named in WHITE's email, on January 5, 2014, this domain name (which uses A.S.'s full name) was created and registered by WHITE.

33. On or about January 5, 2014, from approximately 12:21 p.m. until 7:51 p.m., WHITE sent victim A.S. a string of text messages. WHITE again referred to the domain name he had created using A.S.'s name, and stated, in part (emphasis added):

Praise the liars!!! Oops praise the Lord!! I wonder if there is some way I can affect your future like you have tried to affect my future I wonder if I try hard enough if I can affect your kids future like you have tried to affect my family's future. You think you are a tough bitch but are you willing to gamble on this? I have a long police record with nothing left to lose, shit get [sic] deep quick [victim A.S.'s first name] If I were you I'd figure out a solution first thing on Monday morning and I suggest your company buy these domains And I will be suing Victim R.B. for slander and I'm sure he will give you up.. the ass.. then I will be suing your family And [victim A.S.'s first name] feel free to call me because the lines of communication are now open...and I am perfectly fine with the situation I am in..are you? This [referring to the website in A.S.'s name] will be advertised under people looking for church's or swimming/guard events in YOUR [sic] beach community....Just wait and see I'm listing your children's names on your website...So they will forever be linked with your singing and your slander..."

34. On or about January 6, 2014, at approximately 7:44 a.m., WHITE sent victim A.S. a string of text messages with the A.S. domain name/website typed approximately sixteen times. The texts stated, in part (emphasis added):

I'm emailing all the schools, hitting Facebook...and all the kids will start to talk...did ya [sic] stick it to me [Victim A.S.] Just watch! I'm glad you wanted to dance. Sorry I was so focused on [victim R.B.] Now we are gorna [sic] to focus on you and your children... Their

activity centers, schools and churches. People with receive info about [victim A.S.'s last name] family.

35. On or about January 7, 2014, WHITE sent a text message to victim R.B. The text included, "Sorry I caught you at a bad time this morning [victim R.B.]. I did not hear what you said. Would you like to buy the domains that are kicking you in the ass every day old man? Say something... or I will. I own your name and your son's name on the net. . .somewhat limiting their future....I'm not sure you're being a good father." The website www.[victim R.B.'s last name]FineArt.com is listed more than ten times in the text messages.

a. According to records from the domain service provider, this website using R.B.'s name was created and registered by WHITE on December 17, 2013.

36. On or about January 14, 2014, WHITE sent a text message to R.B.'s son. The text stated, in part, "I know exactly what kind of car you drive and what gym you workout at and I know your address."

37. On or about January 14, 2014, at approximately 9:28 p.m., WHITE sent victim R.B., R.B.'s son, and victim A.S. a string of text messages that stated, in part (emphasis added):

I think some rastas from Silverlake are looking for [Victim A.B.'s first name] And I will be walking on the beach someday..possibly bumping into b [Victim A.S.'s minor child's first name] Do you guys understand that you're[sic] just pissed off a multiple felon, who is borderline bipolar... and had a genius IQ.. And I've already been to jail several times and I am willing to take this one to the rack... Asking for a favor from his prison cell mate [sic] to contact silver lake[sic]... And let the spirit set things right...In fact

I'm coming back to Hollywood and I'm gonna[sic] look around...Maybe start the the [sic]cape fear version of my plan. Take a week devoted to u [sic] !!!! And if you think you think you will be out getting salad..and ya won't see my big ass by ur [sic] car you might be wrong :) [sic]... And I am kind of crazy....you never know what could happen... And for some reason if this Galley[sic] does not succeed it's going to be a little bit more than Cape[sic] fear and public places..It's going to be a man with nothing left to lose...camping out waiting...And waiting.

a. In this message, WHITE went on to state that his friends in Silverlake know the type of car victim R.B. and his son drive. WHITE also said that his friends in Silverlake knew a 10 year old kid in Manhattan Beach or Hermosa Beach who frequents the beach and is in life guard training. WHITE used A.S.'s minor child's first name. WHITE claimed he showed his friends a picture of victim A.S.'s minor child and R.B.'s son. WHITE said that this could be over if they bought the domain names and signed a non-disclosure statement. WHITE said, "Otherwise it's web guns blazing with my dick in your ass and I do have to worry about all of your futures..."

38. On or about January 15, 2014, at approximately 10:57 p.m., WHITE sent victim A.S. a string of text messages with photographs of victim A.S.'s minor child. The texts included comments such as, "accidents sometimes happen on the beach.. And accidents sometimes happen to the children of slandering snakes like you...Are you thinking about me today...ha ha ha... He's a cute kid. It will be very unfortunate if something was to happen to him. I worry tho [sic]..I hope nothing does happen...from the

bottom of my heart : ) [sic]." WHITE then said that he expected to be contacted with a proper monetary figure. WHITE said victim A.S. "will have to deal with Jason White forever."

39. On or about January 16, 2014, at approximately 2:02 p.m., WHITE sent victim A.S. a string of text messages that included, "I own your exact name on the web. It may not show up on google now but some day soon it will. Anyone who does a search for you will find it very soon...Kinda[sic] good work for a delusional guy...I have YOUR [sic] name on the world wide mother fucking web." WHITE claimed to have a friend in Hermosa Beach that he was coming to visit. He also claimed to have just contacted 300 of victim A.S.'s spouse's Facebook friends and claimed to have called victim A.S.'s deacon. The message closed with, "Do you know who I am??? I'm Jason White."

40. On or about January 16, 2014, WHITE sent victim R.B. a text message asking for \$50,000 for three domains to be taken down and \$200,000 for signing a "nondisclosure statement." About twenty minutes later WHITE sent victim R.B. another text message asking for \$285,000.

41. During the month of January 2014, WHITE continued to harass victim R.B., victim A.S., and R.B.'s son by repeatedly calling victim R.B.'s offices and the three victims' cellular telephones. WHITE also called victim A.S.'s personal residence and contacted a deacon at victim A.S.'s church. WHITE also sent

email messages to individuals connected to victim A.S.'s spouse's Facebook account, with derogatory information about victim A.S.

42. On January 23, 2014, WHITE posted a message on victim artist F.P.'s Facebook page with a picture of himself. He claimed that victim artist F.P. stole \$100,000 from him. In the posting, WHITE made allegations that he feared for his life from victim artist F.P. and victim R.B.'s company. He wrote, (with emphasis added):

I'VE BEEN TO YOUR[sic] HOUSE BITCH!!!! U [sic] HAVE NO GATE!!! U [sic] ARE A TWERP!!! I AM NOW FOCUSING ON YOUR FUCKING CHILDREN[sic]!!!! AND WIFE!!!! I WILL WAIT IN THE FUCKING BUSHES TO KNEE CAP A CHILD OF THE MAN WHO SLADERS[sic] MY 92 YR OLD GRANDMA!!!! CRY TO ME WHEN YOUR WIFE AND KIDS GET HURT>>>>>IM[sic] FUCKING COMING BITCH!!!~! [sic] [VICTIM A.S.'S FIRST NAME] WAS JUST TO SHOW YOU!!!YOUR CHILDREN ARE MY END GAME!!!! YOU WERE THE GEEK KID!!! IM THE FUCKING MULTIPLE FELON GANGSTER WHO WANTS TO GET TO THEM!!!!...I will sell my car...sleep in the park... just to get to your family!!! gotta [sic] say HI!!! I have a pro flying to silverlake fuck you!!! or fuck the children!!! I will be out there..the possible deal Ive [sic] been offered is 5k per kid...FAB!

43. On January 23, 2014, WHITE sent a message from SUBJECT EMAIL ACCOUNT 4 to victim artist F.P.'s email account with the subject line, "Im [sic] coming!" The email message stated, in part, (emphasis added):

You can put this on the record and call whatever authorities but I'm coming by you bro [sic] ...and I'm coming by your family...and I may just focus on your kids...And I'm only going to say a quick hi [sic]. But some words last a lifetime.... I have nothing left to lose... and maybe having a bed every night for the next 30 years in a little 8 X 10 room....doesn't sound that bad. Knowing I got ur [sic] peeps [sic] for hurting mine...is worth 100 yrs [sic] in a little room... Please ignore this...please! Silverlake then straight to bev[sic] blvd [sic].... Fuck you!

**E. Consensually Recorded Telephone Call Between R.B. and WHITE**

44. On or about January 14, 2014, victim R.B. conducted a consensually recorded telephone call with WHITE in my presence. R.B. called WHITE on the SUBJECT TELEPHONE and confirmed to me that WHITE had answered the phone. During the recorded call, WHITE asked victim R.B. if R.B. would buy the domain names and sign a non-disclosure statement. WHITE asked what the "figure" was and said "I will beat you up on the internet all day long for the rest of my life..."

**SEPARATE EXTORTION AND STALKING SCHEME INVOLVING VICTIM ARTIST J.F.G. AND HIS FAMILY**

45. On January 22, 2014, the FBI received a complaint alleging that WHITE had been threatening artist J.F.G. and his immediate family. The artist's son, victim T.G., told me the following:

a. Victim T.G. and his brother have a business through which they represent their artist father, J.F.G., and distribute his works. In November of 2013, after being referred to WHITE, the brothers executed several three-month consignment agreements and a three-month distribution agreement with WHITE of "White Publications LLC," doing business as White Galleries, 41493 Margarita Road, Suite 102, Temecula CA, 92561 ("THE SUBJECT PREMISES"). The agreements were related to the sale of specific pieces of victim artist J.F.G.'s artwork. After the consignment and distribution agreements were executed, victim T.G. visited the SUBJECT PREMISES one to two

times a week to check on the sales of his father's art. To promote sales of victim artist J.F.G.'s work, WHITE purchased a few domain addresses to advertise the artist's work.

b. In approximately December of 2013, after learning of WHITE's financial problems, victim T.G. provided WHITE with financial assistance in the form of paying WHITE's security deposit to the electric company. This prevented the power from being disconnected at the SUBJECT PREMISES. WHITE then repeatedly asked victim T.G. for money for various expenses, including rent, advertising, and items for the gallery/SUBJECT PREMISES. In December of 2013, victim T.G. grew concerned about WHITE's behavior. Due to these concerns, victim T.G. removed some of his father's original works from the SUBJECT PREMISES and replaced them with prints. Some of artist J.F.G.'s works, however, remain at the SUBJECT PREMISES. The wholesale value of the art left at the SUBJECT PREMISES is approximately \$40,000 and the retail value is estimated at \$80,000.

c. During January of 2014, WHITE began sending email messages to the brothers claiming that the brothers had breached their contract with WHITE and that WHITE was owed money for his services. WHITE threatened that if he was not paid, he would post derogatory information about victim artist J.F.G on the internet. One of the brothers lives and received these emails outside of California.

d. During the week of January 20, 2014, victim T.G. attempted to visit the SUBJECT PREMISES on a few occasions. Victim T.G. saw a sleeping bag in the back of the gallery and WHITE admitted to victim T.G. that WHITE was living at the gallery. However, on one occasion, WHITE refused to open the door for victim T.G., brandished a knife in his hand, and told victim T.G. to leave.

e. On January 20, 2013, at approximately 1:43 p.m., WHITE, using SUBJECT EMAIL ACCOUNT 4, sent an email message to victim J.G. and T.G.'s email accounts with the subject, "Notice of breach - collecting our fee." The email was addressed to their family and included allegations that the wholesale and retail contracts were breached due to lack of communication and an allegation that victim T.G. and J.G. attempted to break open the gallery doors. The email in part included, "..our fee is 41,000. Last night cost us time and a damaged door. if [sic] your family can not pay our fee within 2 business days form [sic] this notice, all consigned inventory will be forfeited. We will only speak to a lawyer. And the [members of the victim's family are] not welcomed at [sic] gallery in temecula." WHITE sent similar messages on January 20, 2014 and January 21, 2014, each time increasing the amount WHITE claimed he was owed. Victim J.G. received these emails outside of California.

f. On January 21, 2014, WHITE attempted to call victim artist J.F.G.'s spouse's cellular telephone (which is located outside of California). Victim J.F.G.'s spouse did not take the



calls. In the messages, WHITE threatens to post negative information about the victims on the internet and suggested that he might travel to the state where the victims live.

46. On January 22, 2014, victim T.G. provided me with text messages received over the previous few days from WHITE using the SUBJECT TELEPHONE. In one text message, WHITE sent a picture of victim T.G.'s minor child to victim T.G. and wrote (emphasis added):

In a moment I'm coming to talk to [victim T.G.'s minor child] do [sic] the proper research and I will stand outside that bitches school..and you are fucked...Once this Gallery closes all I have to do in my life is take care of [victim T.G.'s minor child]... And what if I'm willing to do the time!!! You don't fucking know me bitch..You are fucked!!!!!!!!!!!! Say something bitch...Fuck you...I was straight up about to have my dick in your wife's ass...And I'll probably still end up fucking her...this all turns her On [sic]..Oh no I'm sure... Just so you know"

i. Throughout this text exchange are photos of victim T.G.'s minor child and pictures of victim T.G. and with his spouse and child.

47. In another text message provided by victim T.G., WHITE wrote:

Say something bitch, fuck you..and I actually have a fucking death wish and I put guns to my head in the hood but the dealers wouldn't hold the trigger... Get it??? I am the kind of guy that will drive to Beverly Hills or fucking texas [sic] or Pasadena [locations where several victims reside] if I need to... but I haven't need [sic] to because everybody is a fucking bitch like you...

a. Incorporated into this text message is a photo of WHITE at the SUBJECT PREMISES.

F. The SUBJECT PREMISES and THE SUBJECT VEHICLE

48. As stated above, according to victim T.G., WHITE said that WHITE was living at the SUBJECT PREMISES (an art gallery in Temecula). In addition, victim T.G. saw a sleeping bag in the back of the SUBJECT PREMISES when he visited the gallery in January of 2014. Law enforcement agents have conducted surveillance of the SUBJECT PREMISES in January and February of 2014 and have seen WHITE at the SUBJECT PREMISES. During one surveillance, a law enforcement agent entered the SUBJECT PREMISES and saw a laptop computer on a desk in the gallery. Also during surveillance in January and February of 2014, agents have seen a white 2004 Nissan Altima, with a registered owner "Fargo Gallery LLC," ("the SUBJECT VEHICLE"), parked at the SUBJECT PREMISES both early in the morning and late in the evening. The SUBJECT VEHICLE has a North Dakota license plate and is believed to belong to WHITE.

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IV. CONCLUSION

49. Based upon the foregoing, I believe that there is probable cause to believe that JASON WHITE has committed a violation of Title 18, United States Code, Section 2261A(2)(A).

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Elizabeth Rivas  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN BEFORE ME

THIS 11 DAY OF February, 2014

ANDREW J. WISTRICH

THE HONORABLE

UNITED STATES MAGISTRATE JUDGE

