

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

24 MAG 177

UNITED STATES OF AMERICA

v.

KYLE WHITE,

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 2251(d)(1)(A),  
(d)(2) and (e), and 2252A(a)(2)(B) and  
(b)(1)

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

NICOLE KWASNAZA, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

**COUNT ONE**  
**(Advertisement of Child Pornography)**

1. From at least in or about September 2022 through in or about December 2023, in the Southern District of New York and elsewhere, KYLE WHITE, the defendant, knowingly made, printed, and published, and caused to be made, printed, and published, a notice and advertisement seeking and offering to receive, exchange, buy, produce, display, and reproduce a visual depiction, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct, and WHITE, the defendant, knew and had reason to know that such notice and advertisement would be transported using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce by any means including by computer and mailed, and such notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer and mailed, to wit, KYLE WHITE advertised the sale of, and sold, access to groups and channels on Telegram known as "The Ho Zone" containing sexually explicit images and videos of minors to numerous individuals, including individuals located in New York, New York.

(Title 18, United States Code, Sections 2251(d)(1)(A), (d)(2) and (e).)

**COUNT TWO**  
**(Receipt and Distribution of Child Pornography)**

2. From at least in or about September 2022 through in or about December 2023, in the Southern District of New York and elsewhere, KYLE WHITE, the defendant, knowingly received and distributed material that contains child pornography using a means and facility of interstate and foreign commerce and that has been mailed and has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, KYLE WHITE, granted access to groups and channels on Telegram known as "The Ho Zone" containing

sexually explicit images and videos of minors to numerous individuals, thereby distributing those materials, including to individuals located in New York, New York.

(Title 18, United States Code, Sections 2252A(a)(2)(B) and (b)(1).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been employed by the FBI since June 2017, first as an FBI Honors Intern, next as an Information Technology Specialist/Forensic Examiner, and now as a Special Agent. I have been a Special Agent since December 2022. During my career with FBI, I have participated in criminal investigations involving cybercrime, fraud, child exploitation, and counterterrorism. I have been personally involved in the investigation of this matter. I base this affidavit on that experience and on training I have received, on my conversations with other law enforcement officers, and on my examination of various reports and records, including electronic evidence. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### **“The Ho Zone”**

4. Based on my review of the Telegram website and my training and experience, I have learned that Telegram is a free, cloud-based mobile and desktop messaging application with over 700 million monthly active users.<sup>1</sup> Telegram users can send messages, photos, videos, and other files, as well as create groups for up to 200,000 members, or channels for broadcasting to audiences of unlimited size. Telegram groups can be public or private, and there is a setting allowing group administrators to permit or prevent group members’ access to messages in the group that pre-date when a member joins. According to the Telegram website, group administrators can “pin important messages to the top of the screen so that all members can see them, including those who have just joined.” An administrator can add people to a Telegram group via his contacts list, searching by username, or sending an invite link. “Anyone who has Telegram installed will be able to join [a] group by following [that] link.” Separately, Telegram channels “are a tool for broadcasting messages to large audiences,” and channels can have “an unlimited number of subscribers.” New subscribers can see the entire message history in a channel once they join. Like groups, channels can be public or private. “Private channels are closed societies—you need to be added by the owner or get an invite link to join.”

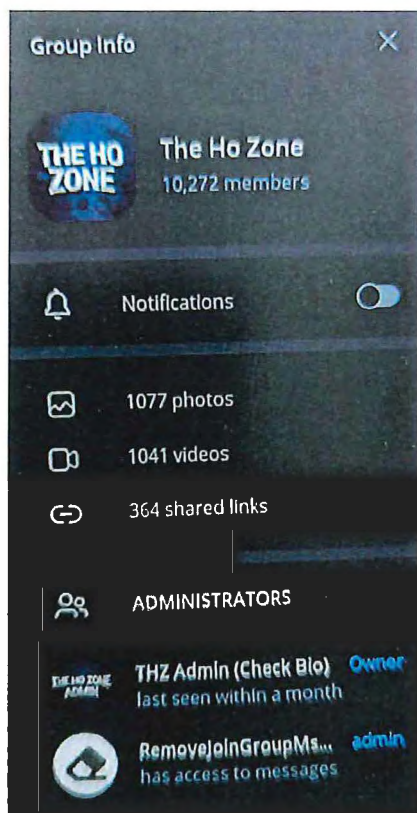
5. Based on my participation in this investigation and my review of Telegram, I have learned, among other things, the following:

a. “The Ho Zone” is a Telegram group that on or about November 8, 2023 had approximately 10,272 members, 1,077 photos, 1,041 videos, and 364 shared links. The administrators of The Ho Zone are “THZ Admin (Check Bio)” with handle @THZAdmin

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<sup>1</sup> See [telegram.org/faq](https://telegram.org/faq) and [telegram.org/faq\\_channels](https://telegram.org/faq_channels).

(hereinafter, “THZ Admin”), and “RemovejoinGroupMsgBot” with handle @Bot442.<sup>2</sup> A screenshot containing information about The Ho Zone group is below.<sup>3</sup>

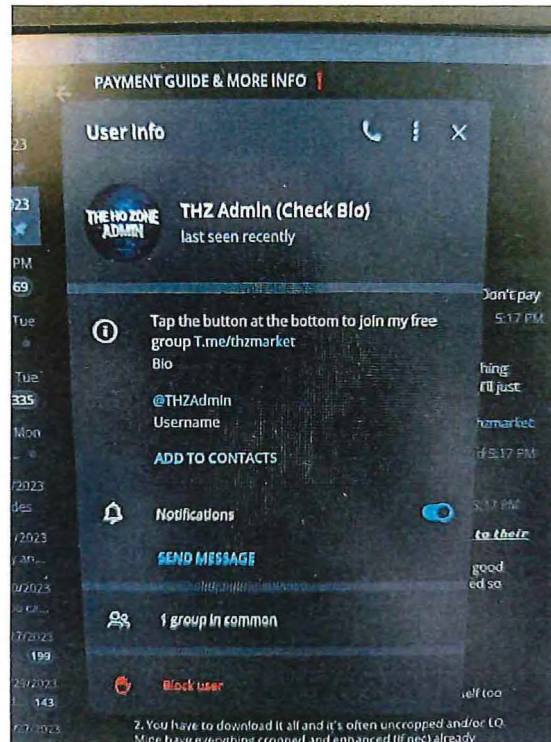


b. THZ Admin is a Telegram user with a profile picture that says, “THE HO ZONE ADMIN.” The bio for THZ Admin states: “Tap the button at the bottom to join my free group T.me/thzmarket.” Below is a screenshot of user information for THZ Admin.

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<sup>2</sup> According to open-source information, “RemovejoinGroupMsgBot” is a bot that automatically removes messages populated when users join or leave a group.

<sup>3</sup> Each screenshot in this Complaint was taken by me or another law enforcement officer when we viewed publicly available groups and channels on The Ho Zone from our computers and/or phones while located in New York, New York. Unless otherwise stated, when we captured these images, we were viewing The Ho Zone as members of the public who had “joined” The Ho Zone. No payments or approvals were required in order for us to gain access.



c. The website T.me/thzmarket links to the Telegram channel “The Ho Zone Market.” The Ho Zone Market was created on October 6, 2022. As of on or about September 18, 2023, The Ho Zone Market had over 3,400 subscribers, and as of on or about November 8, 2023, The Ho Zone Market had approximately 3,610 subscribers. The Ho Zone Market channel is part of The Ho Zone group. In addition to linking to The Ho Zone Market, THZ Admin also posts in the main The Ho Zone group.

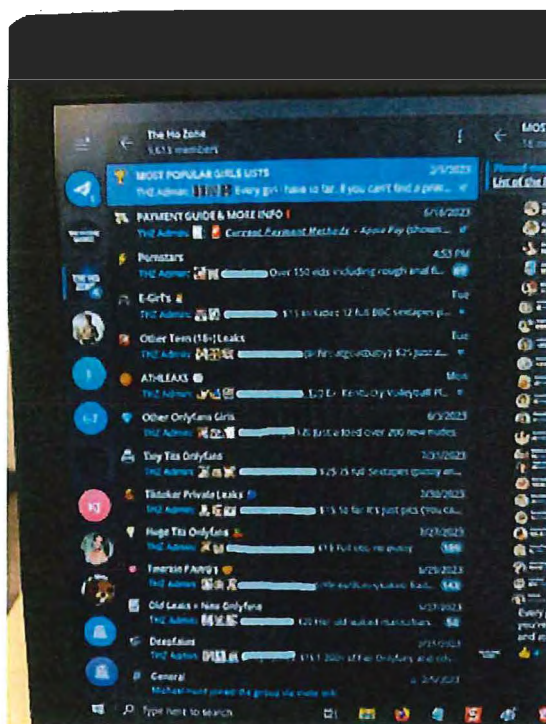
d. The Ho Zone group has dozens of channels, including, but not limited to, the following:

- Other Teen (18+) Leaks
- MOST POPULAR GIRLS LISTS
- PAYMENT GUIDE & MORE INFO!
- Tiktoker Private Leaks
- ATHLEAKS
- Other Onlyfans Girls<sup>4</sup>
- Tiny Tits Onlyfans
- Huge Tits Onlyfans
- Old Leaks + New Onlyfans

e. As further explained below, The Ho Zone sells access to sexually explicit photographs and videos of minors and adult women without their consent, and the above-listed channels categorize the type of material for sale on The Ho Zone. The Ho Zone group is open to

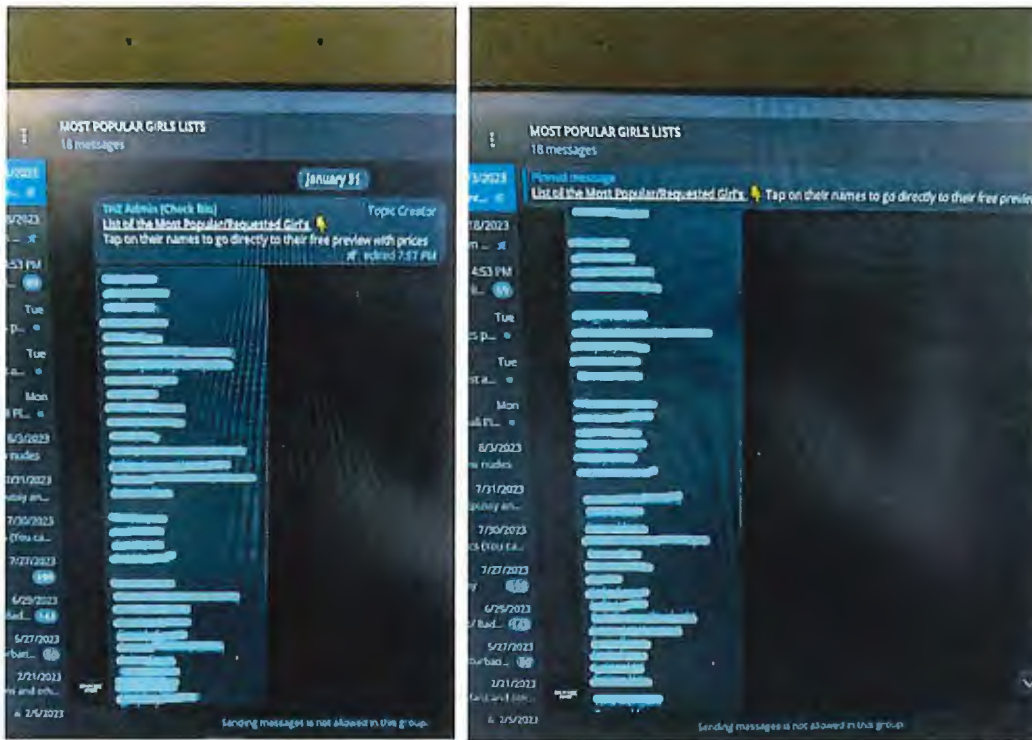
<sup>4</sup> OnlyFans is an 18+ subscription platform in which individuals can sell access to their private, and often sexual, content.

the public. Below is a screenshot of some of the channels available within The Ho Zone group, with references to names or monikers of victims omitted to protect their privacy.



f. Within The Ho Zone channels, customers can purchase access to sexually explicit photographs and videos of dozens of women and girls who are listed by name. For example, a pinned message from THZ Admin on the “MOST POPULAR GIRLS LISTS” channel advertises this channel as “[e]very girl I have so far.” THZ Admin directs users to click on the names of specific women and girls “to go directly to their free preview with prices.” THZ Admin tells users that if they “can’t find a preview for them or if [they’re] looking for rare leaks,” they should “DM,” or send a direct message, to @THZadmin. Below are screenshots listing only some, but not all, of the women and girls whose sexual images and videos are for sale on The Ho Zone channel “MOST POPULAR GIRLS LISTS.” Specifically, the below images list victim names in alphabetical order showing only a portion of A through C on the left, and only a portion of N through T on the right. The names or monikers of victims have been omitted in these images to protect their privacy. Each of these victim names or monikers links to a separate channel within The Ho Zone.





g. When a Telegram user clicks on the name of a specific woman or girl, the user is directed to a separate channel filled with content specific to that individual woman or girl. Each channel includes a variety of free and often publicly available content as a preview of what a user will get if they pay money for full access. The free channel preview also typically includes a description of what additional sexually explicit content the user will get if they pay.

h. For instance, The Ho Zone channel selling stolen, sexually explicit content of one young adult woman who is well known on social media platforms including TikTok<sup>5</sup> and Instagram<sup>6</sup> (“Victim-1”) includes free photographs in which Victim-1 is fully clothed (the “Victim-1 Channel”). The description for the Victim-1 Channel states, “Only place u can get the full [Victim-1] leaks set.”<sup>7</sup> As on or about of January 3, 2024, the Victim-1 Channel containing free content has approximately 4,387 subscribers. The price for access to the paid Victim-1

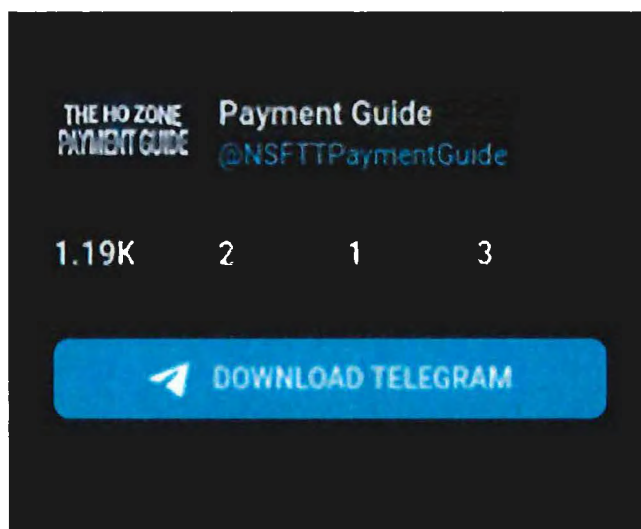
<sup>5</sup> TikTok is a social media application where users can post short-form videos.

<sup>6</sup> Instagram is a social media application where users can post photos and short-form videos.

<sup>7</sup> From my participation in this investigation, conversations with witnesses, conversations with other members of law enforcement, and review of records, I have learned that in or around August 2022, the cellphone of Victim-1 was unlawfully accessed via a social engineering scheme, and private, sexually explicit photographs and videos of Victim-1 and others, including Victim-1’s sexual partners, were stolen from Victim-1’s Snapchat application on her cellphone. Snapchat is a multimedia instant messaging application that features photos and videos that disappear after a message recipient views the message. There is no evidence to suggest that KYLE WHITE, the defendant, hacked Victim-1’s cellphone.

Channel was previously \$75 and was then offered on sale for \$45. As of on or about January 3, 2024, the paid Victim-1 Channel has approximately 75 subscribers.<sup>8</sup> A message on the Victim-1 Channel advertises, “Has abt 4 mins worth of her sucking dick and getting fucked in all positions. (My compilations/edits and the OG files inc) plus 50 more new extremely rare [flames emoji] nude pics/vids[.]” The message further states, “This is the only FULL original in HD with the OG leaks and edits/enhancements I spent hours making. Not some trash recordings from a phone[.]” According to an icon at the bottom right of the message, this particular message was seen by approximately 115,300 people.

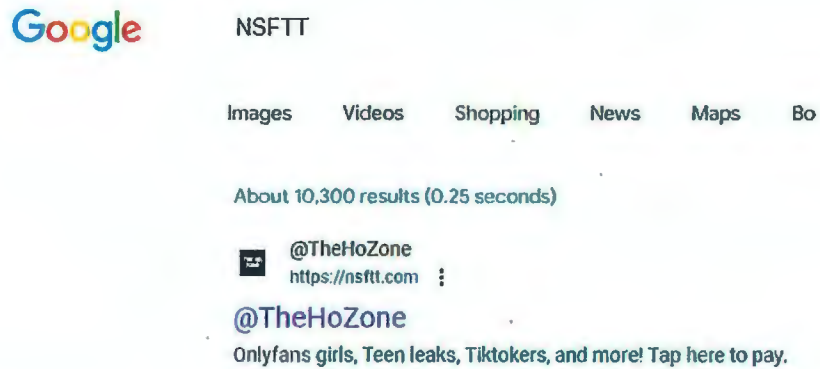
i. Another message on the Victim-1 Channel includes information on “[h]ow to pay” as “[p]roof I’ll actually add u and this isn’t some scam,” which links to <http://t.me/NSFTTPaymentGuide>.<sup>9</sup> This link connects users to a channel with over 1,000 subscribers called “Payment Guide,” with handle @NSFTTPaymentGuide, with a profile picture stating, “THE HO ZONE PAYMENT GUIDE” (the “Payment Guide Channel” or “Payment Guide”). The Payment Guide Channel was created on or about July 27, 2022. Below is a screenshot of the Payment Guide Channel information.



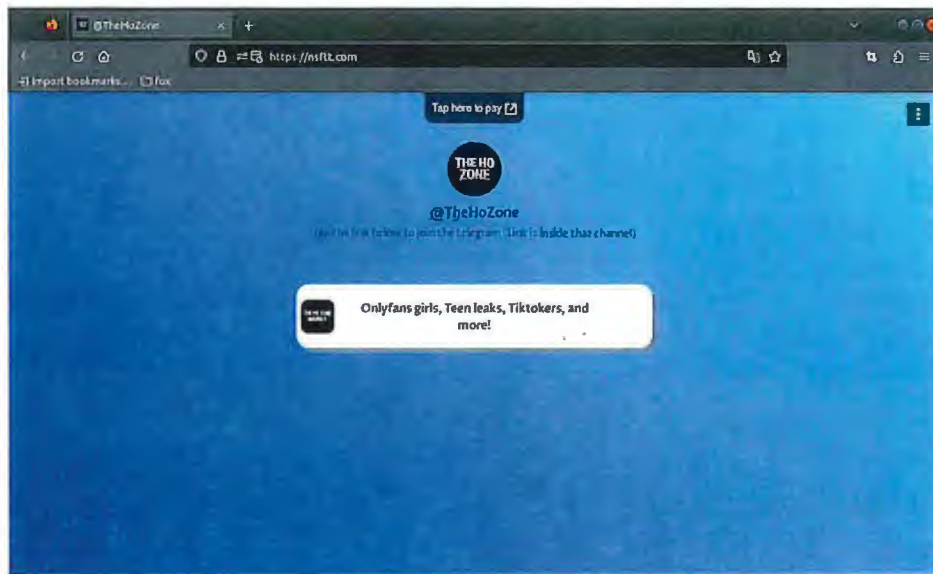
<sup>8</sup> As explained further below in Paragraph 22, I know information about the paid Victim-1 Channel because an undercover FBI agent purchased access to it, and I have personally reviewed it.

<sup>9</sup> Google search results indicate that “NSFTT” is an abbreviation for “Not safe for TikTok.” According to the TikTok Community Guidelines, “Nudity, pornography, or sexually explicit content are not allowed on our platform. Any content that depicts or supports non-consensual sexual acts, [and] the sharing of non-consensual intimate imagery . . . are strictly prohibited.” See <https://www.tiktok.com/creators/creator-portal/en-us/community-guidelines-and-safety/community-guidelines/>.

6. Based on my participation in this investigation and my review of publicly available webpages, I know that the first result in a Google search of “NSFTT” is the website <https://nsftt.com>, called “@TheHoZone,” advertising “Onlyfans girls, Teen leaks, Tiktokers, and more! Tap here to pay.” Below is a screenshot of this Google search.



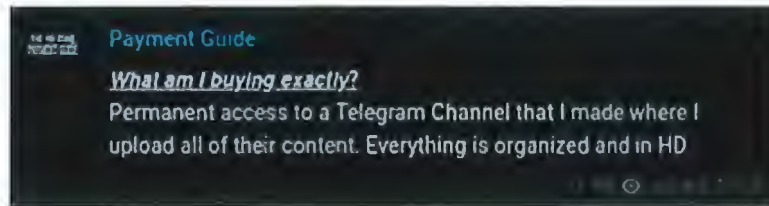
7. Based on my participation in this investigation and my review of publicly available webpages, I know that the @TheHoZone website (<https://nsftt.com>) links directly to The Ho Zone Telegram groups and channels, including [t.me/THZmarket](https://t.me/THZmarket) and [t.me/NSFTTPaymentGuide](https://t.me/NSFTTPaymentGuide). Below is a screenshot of the @TheHoZone website.



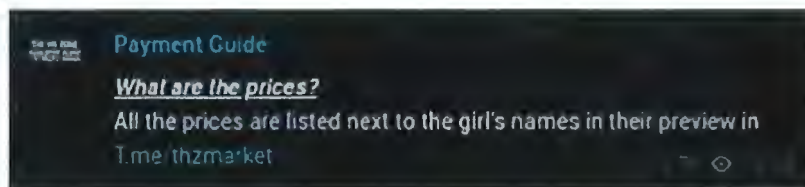
8. Based on my participation in this investigation and my review of Telegram, I know that the Payment Guide Channel ([t.me/NSFTTPaymentGuide](https://t.me/NSFTTPaymentGuide)) features numerous posts about The Ho Zone in a question-and-answer format. Below are some of these posts, with screenshots from the Payment Guide Channel.



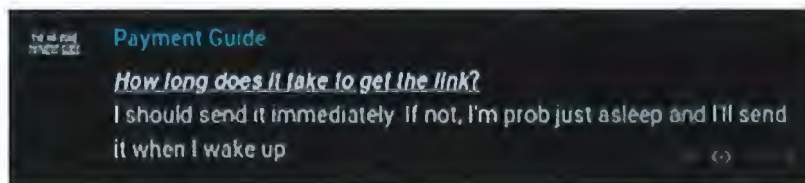
a. “What am I buying exactly?” Permanent access to a Telegram Channel that I made where I upload all of their content. Everything is organized and in HD.”



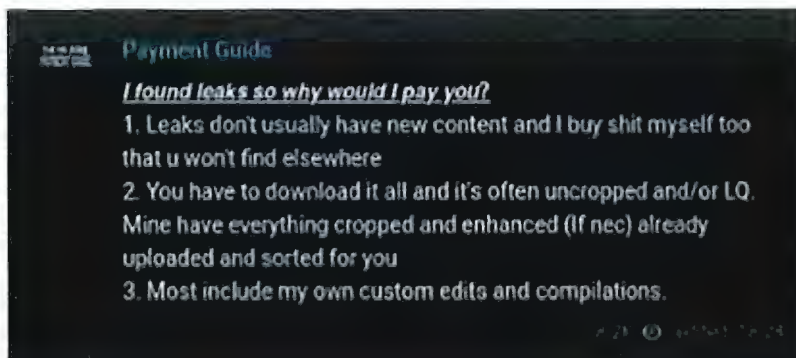
b. “What are the prices?” All the prices are listed next to the girl’s names in their preview in T.me/thzmarket.”



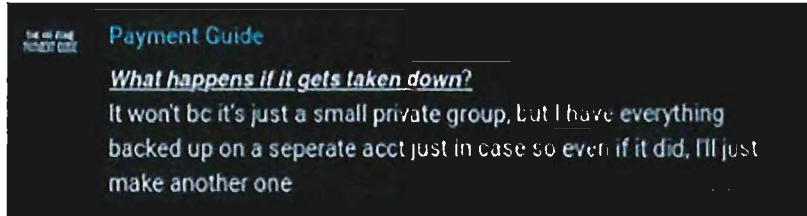
c. “How long does it take to get the link?” I should send it immediately. If not, I’m prob just asleep and I’ll send it when I wake up.”



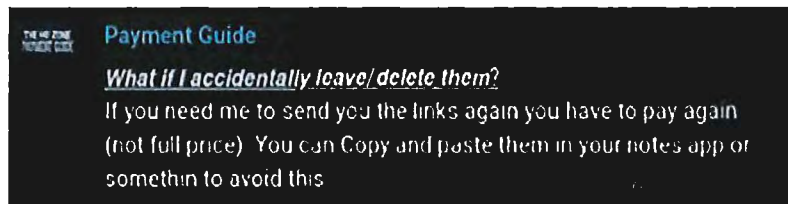
d. “I found leaks so why would I pay you?” 1. Leaks don’t usually have new content and I buy shit myself too that u won’t find elsewhere[.] 2. You have to download it all and it’s often uncropped and/or LQ. Mine have everything cropped and enhanced (If nec) already uploaded and sorted for you[.] 3. Most include my own custom edits and compilations.”



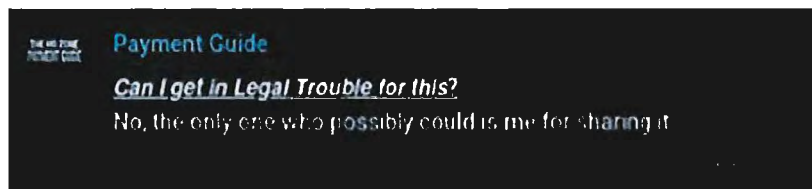
e. “What happens if it gets taken down?” It won’t bc it’s just a small private group, but I have everything backed up on a separate acct just in case so even if it did, I’ll just make another one.”



f. “What if I accidentally leave/delete them?” If you need me to send you the links again you have to pay again (not full price). You can Copy and paste them in your notes app or somethin to avoid this.”

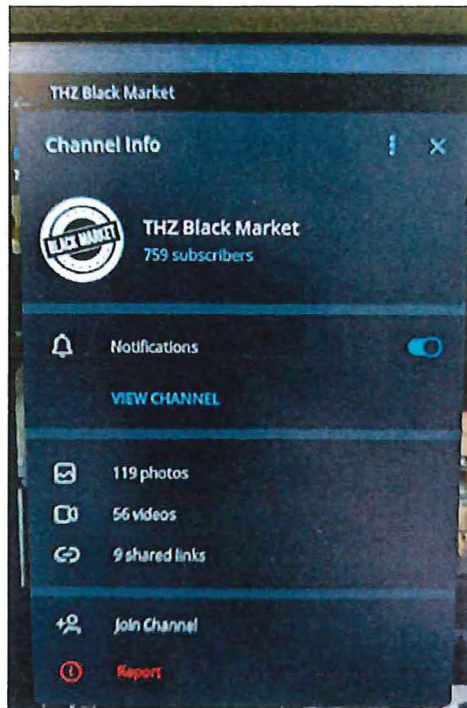


g. “Can I get in Legal Trouble for this?” No, the only one who possibly could is me for sharing it.”

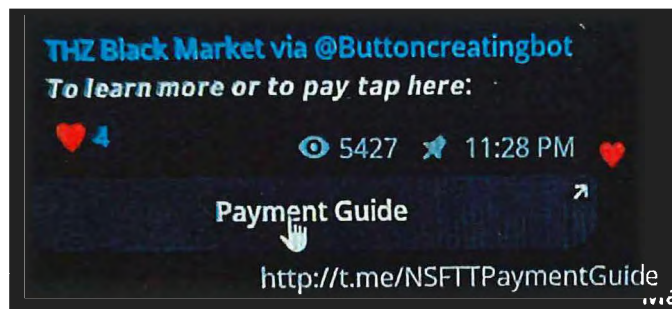


9. Based on my participation in this investigation and my review of Telegram, I have learned, among other things, the following:

a. “THZ Black Market” is another channel associated with The Ho Zone. I believe that “THZ” is an abbreviation for “The Ho Zone.” As of in or around August 2023, THZ Black Market had 759 subscribers, 119 photos, and 56 videos. As of on or about September 8, 2023, THZ Black Market was no longer accessible to the public on Telegram. Below is a screenshot of the information about this channel before it was taken down, taken on or about August 17, 2023.



b. THZ Black Market includes the link to the same Payment Guide Channel connected to other channels of The Ho Zone: <http://t.me/NSFTTPaymentGuide>. Below is a screenshot.

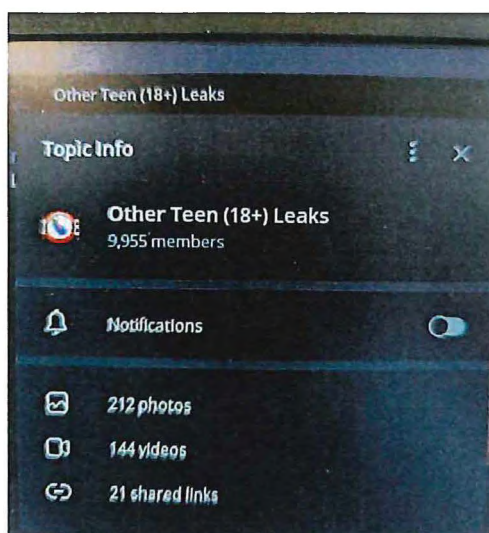


c. Material for sale on the THZ Black Market is advertised to be the product of blackmail or coercion. For instance, as of August 2023, the THZ Black Market channel advertised the following:

- i. “[Victim-2]: \$15 Full video call where she’s made to strip and crying and the rest of her [emoji] super rare BM leaks.”
- ii. “[Victim-3]: \$15 a 22 min video call where she reluctantly follows orders to strip and masturbate. Plus 2 riding vids & more.”

- iii. “[Victim-4 and Victim-5]: \$35 Inc live video calls and convos [Victim-4] and her friend where she does whatever her blackmailer (Snapgod) teller her.”<sup>10</sup>
- iv. “[Victim-6]: \$25 Girl blackmailed into filming sextapes with her BF, pussy & anal fingering, pissing, and more.”
- v. “[Victim-7]: \$10 Cute girl blackmailed into fucking her ass.”

d. “Other Teen (18+) Leaks” is another channel to which The Ho Zone sells access to sexually explicit content of minors, and adult women without their consent. As of on or about September 8, 2023, Other Teen (18+) Leaks has nearly 10,000 members, 212 photos, and 144 videos. A screenshot of the information for this channel is below.

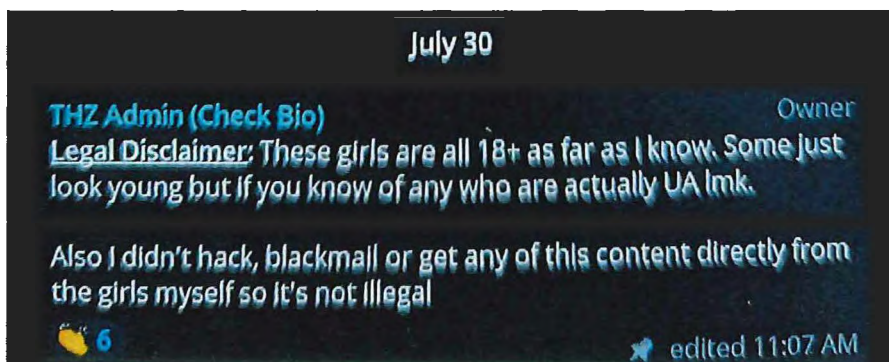


e. On or about July 30, 2023, THZ Admin posted the following message on the Other Teen (18+) Leaks channel: “**Legal Disclaimer:** These girls are all 18+ as far as I know. Some just look young but if you know of any who are actually UA<sup>11</sup> lmk. Also I didn’t hack, blackmail or get any of this content directly from the girls myself so it’s not illegal.” A screenshot of this message is below.

<sup>10</sup> Based on my participation in this investigation and open-source information, “Snapgod” is a known moniker for a specific group of individuals who extort and blackmail women and minors on the internet into recording sexually explicit content against their will.

<sup>11</sup> “UA” is a commonly known abbreviation for “underage.”





10. Based on my participation in this investigation and my review of Telegram, I know that despite this “legal disclaimer,” the Other Teen (18+) Leaks channel does in fact sell access to sexually explicit images and videos of minors.

a. For example, as of in or around September 2023, the Other Teen (18+) Leaks channel advertises the sale of material depicting a certain minor victim (“Minor Victim-1”). The cost for access is \$25 and the description reads: “Part of THZ BLACK MARKET,” and “THZ BLACK MARKET” is hyperlinked. Through conversations with other law enforcement officers and as further described below, I have learned that Minor Victim-1 is a minor in the material available for purchase on the “Other Teen (18+) Leaks” channel.

b. As of in or around September 2023, the Other Teen (18+) Leaks channel also advertises the sale of material depicting a different minor victim (“Minor Victim-2”). The cost for access is \$25 and the description reads: “Long Video Calls, upclose pussy fingering, naked Tiktoks, and much more.” Through conversations with other law enforcement officers and as further described below, I have learned that Minor Victim-2 is a minor in the material available for purchase on the Other Teen (18+) Leaks channel.

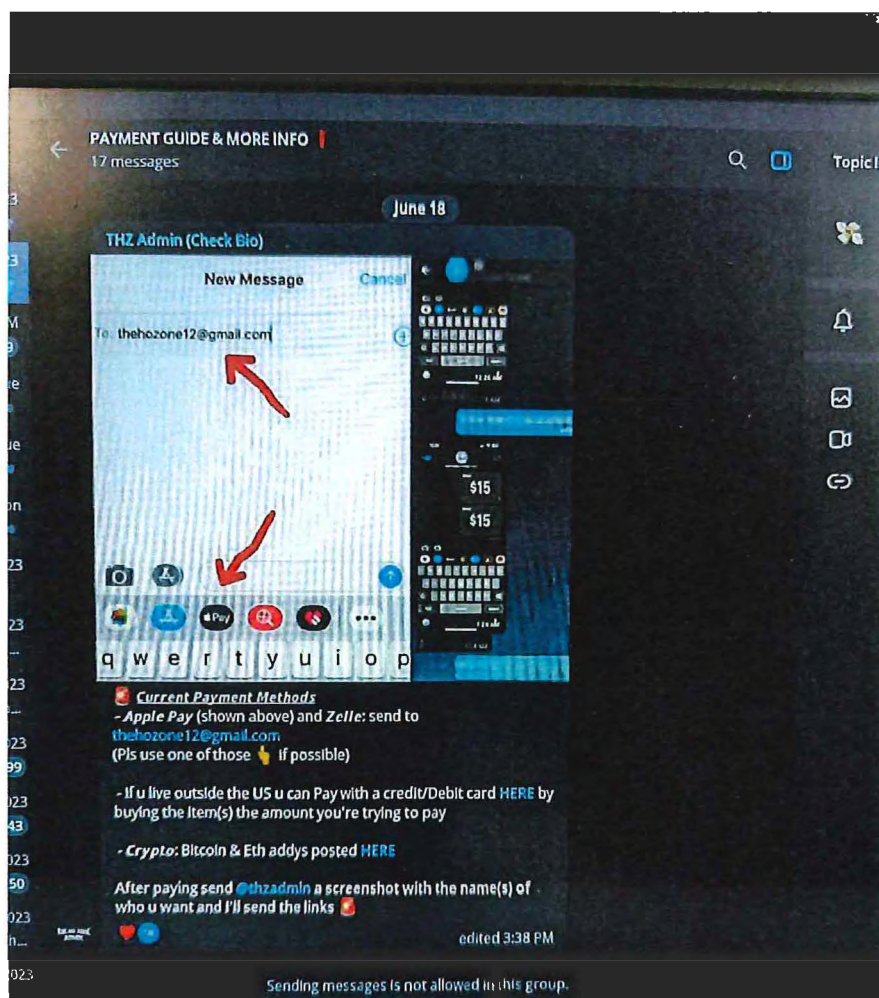
c. As of in or around September 2023, the Other Teen (18+) Leaks channel also advertises the sale of material depicting an additional minor victim (“Minor Victim-3”). The cost for access is \$25 and the description reads: “Blackmailed into getting fingered by and sucking her little brother’s dick. Rough pussy/anal masturbation and much more shit.” Through conversations with other law enforcement officers and as further described below, I have learned that Minor Victim-3 is a minor in the material available for purchase on the Other Teen (18+) Leaks channel.

### **KYLE WHITE is the Owner and Operator of The Ho Zone**

11. As further detailed below, there is probable cause to believe that KYLE WHITE, the defendant, is the owner and operator of The Ho Zone group and its associated accounts, groups, and channels, including the accounts, groups, and channels advertising and selling access to sexually explicit images and videos of minors.

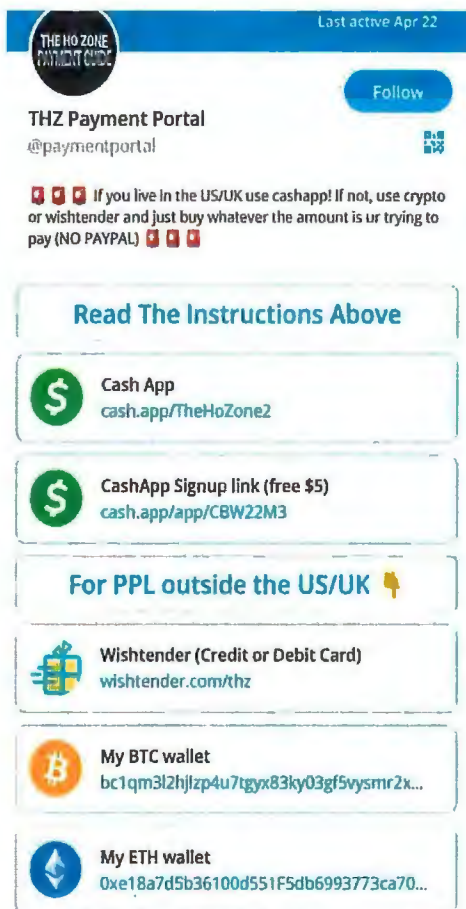
12. Based on my participation in this investigation and my review of Telegram, I know that The Ho Zone Payment Guide Channel contains a link connecting users to another channel called “PAYMENT GUIDE & MORE INFO!” The “PAYMENT GUIDE & MORE INFO!”

channel includes a message posted on or about June 18, 2023 by THZ Admin regarding how users can pay for premium access on The Ho Zone. “Current Payment Methods” include: (1) Apple Pay and Zelle, with directions for payments to be sent to thehozone12@gmail.com; (2) credit or debit card for users outside the United States, with directions to pay via <http://wishtender.com/THZ>,<sup>12</sup> and (3) cryptocurrency payments in the form of Bitcoin (BTC) and Ethereum (ETH), with specific cryptocurrency wallets listed. After paying, users are directed to send “@thzadmin a screenshot with the name(s) of who u want and I’ll send the links.” Below is a screenshot of this message.



13. Based on my participation in this investigation and my review of Telegram, I know the cryptocurrency instructions in the above message further link to <http://allmylinks.com/paymentportal>, which shows a user by the name of “THZ Payment Portal” with the handle @paymentportal, and with a profile picture stating, “THE HO ZONE PAYMENT GUIDE.” Two screenshots of “THZ Payment Portal” are below, with the image on the left “[I]ast active” as of April 22, 2023 and the image on the right “[I]ast active” as of August 7, 2023.

<sup>12</sup> According to its website, WishTender is a “free and safe way to share wishlists.” Users can create lists of items they desire, and other individuals can give users money through WishTender to purchase those goods.



14. As depicted above, the payment instructions provided by THZ Payment Portal as of April 22, 2023 include the option to pay for The Ho Zone material using online payment platform Cash App, and specifically directs users to send funds to cash.app/TheHoZone2 (“TheHoZone2 Cash App Account”).

a. Records obtained from Block, Inc.—the entity that owns Cash App—reflect that the TheHoZone2 Cash App Account was created on or about October 4, 2022. Using the date of birth and social security number provided by the owner of the TheHoZone2 Cash App Account, Block was able to verify the identity of the owner to be “Kyle White.” There have been three display names used by the TheHoZone2 Cash App Account: (1) “Kyle White”; (2) “HoZone”; and (3) “THZ.” Aliases and phone numbers associated with the TheHoZone2 Cash App Account include, among others: “thehozone2”; “kwhitcash12”; “kwhitcash11”; kwhitzigzag12@gmail.com, and a phone number ending in -4595 (the “4595 Number”).

b. The records obtained from Block reflect that there are two addresses associated with TheHoZone2 Cash App Account: (1) a Louisville, Kentucky address where KYLE WHITE, the defendant, resides (the “Louisville Address”),<sup>13</sup> and (2) an Albuquerque, New Mexico

<sup>13</sup> I know that the Louisville Address belongs to WHITE because, among other reasons, as further discussed below, on September 19, 2023, I participated in the execution of a search warrant at the Louisville Address, confirmed that WHITE resides there, and interviewed WHITE during the



address which belongs to fictional television character Walter White, the high-school-chemistry-teacher-turned-narcotics-kingpin played by actor Bryan Cranston in the hit AMC television series *Breaking Bad*. Additional records indicate that WHITE has also used the alias “Walter White” in dealings with Block.

c. Records obtained from Google show that kwhitzigzag12@gmail.com—the email address associated with the TheHoZone2 Cash App Account—is an account belonging to “Kyle White.” The recovery SMS phone number for this Google account is the 4595 Number.

d. Block records link the TheHoZone2 Cash App Account to a card issued by Sutton Bank. Records provided by Sutton Bank identify an account owner named “Kyle Stephen White” who resides at the Louisville Address. Transaction information from Sutton Bank reflects transactions with OnlyFans, Cash App, Apple Pay, and Venmo.

e. Block records further link the TheHoZone2 Cash App Account to a bank account at Republic Bank and Trust Company (“Republic Bank”). Records provided by Republic Bank indicate that the owner of the relevant bank account is “Kyle White,” who resides at the Louisville Address, and whose cellphone is the 4595 Number. The Republic Bank records include account statements from in or around July 2016 through in or around June 2023. Between approximately February 2023 and June 2023, approximately \$117,117.53 was deposited by “Cash App THZ” into WHITE’s Republic Bank account.

15. Based on my participation in this investigation and my review of Telegram, I know that the payment instructions provided by the THZ Payment Portal as of August 7, 2023 include the option to pay for The Ho Zone material using Apple Pay or Zelle, and the THZ Payment Portal directs users to send such payments to thehozone12@gmail.com.

a. Records obtained from Google identify the owner of thehozone12@gmail.com to be “Kyle White.”

b. Records obtained from Apple identify thehozone12@gmail.com as an additional email associated with kwhituk12@gmail.com, which is owned by “Kyle White” of the Louisville Address.<sup>14</sup> Two phone numbers are associated with the Apple account, one of which is the 4595 Number.

16. Based on my participation in this investigation and my review of Telegram, I know that the payment instructions provided by “THZ Payment Portal” as of August 7, 2023 also include the option to pay for The Ho Zone material using cryptocurrencies Bitcoin and Ethereum. Specifically, users who wish to pay in Bitcoin are directed to a particular BTC wallet, and users who wish to pay in Ethereum are directed to a particular ETH wallet. Records obtained from cryptocurrency exchange platform Coinbase indicate the same account information associated

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execution of the search. In addition, WHITE’s valid Kentucky driver’s license indicates that his home address is the Louisville Address.

<sup>14</sup> I know that the email account kwhituk12@gmail.com belongs to KYLE WHITE, the defendant, because on November 20, 2023, WHITE sent me an email from this account which stated in part, “Hey this Kyle White. We met a couple months ago when you executed a search warrant . . . .”



with both the particular BTC and ETH wallets referenced above. Both cryptocurrency wallets are owned by “Kyle White” of the Louisville Address, who uses the 4595 Number.

17. An open-source search of Venmo, using identifiers associated with the TheHoZone2 Cash App Account, resulted in the discovery of Venmo account “TheHo Zone” (the “TheHo Zone Venmo Account”).

a. Records obtained from PayPal, Inc.—the owner of Venmo—reflect three account numbers associated with the TheHo Zone Venmo Account. Each account number is owned by first name “TheHo,” last name “Zone.” The phone number provided to PayPal by “TheHo Zone” is the 4595 Number. Email addresses associated with the TheHo Zone Venmo account include kwhitzigzag12@gmail.com, nsftiktok@gmail.com, and kwhituk12+1@gmail.com.

b. PayPal records show financial transactions on the TheHo Zone Venmo Account, under one account number, from in or around August 2022 through in or around September 2022, and under a second account number, from in or around October 2022 through in or around December 2022. The third account number remained active at least through January 2023. Transaction notes from all three account numbers associated with TheHo Zone Venmo Account include the names of women and girls listed on the “MOST POPULAR GIRLS LISTS” channel.

18. Further open-source searching of Venmo resulted in the discovery of Venmo account “thz123” (the “thz123 Venmo Account”).

a. Records obtained from PayPal indicate that thz123 Venmo Account was created in June 2023 and remained active as of September 2023.

b. Records obtained from PayPal identify one account number associated with the thz123 Venmo Account. The account owner is “Kyle White” of the Louisville Address with email thehozone12@gmail.com.<sup>15</sup>

c. Transaction notes from the thz123 Venmo Account include “Telegram,” “Tele,” “TG,” “Services,” and “Fee payment.” Transaction notes also include the names of women and girls listed on the “MOST POPULAR GIRLS LISTS” channel.

19. Based in my participation in this investigation, I know that on or about September 18, 2023, the Honorable Colin H. Lindsay, United States Magistrate Judge, Western District of Kentucky, signed a search warrant authorizing the search of the premises located at the Louisville Address and the search of the person of KYLE WHITE, the defendant (the “WDKY Warrant”). As noted above in Footnote 13, on or about September 19, 2023, I personally participated in the execution of the WDKY Warrant at the Louisville Address. During the execution of the WDKY Warrant, a OnePlus 7TPro cellphone was seized from the person of WHITE (the “White Phone”),

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<sup>15</sup> The phone number associated with this account ends in -2796 (the “2796 Number”).

and a Samsung S8 Tablet was seized from a TV tray inside of the Louisville Address (the “White Tablet”).<sup>16</sup>

20. Based on my review of the electronic contents of the White Phone, I have learned the following:

- a. The call number associated with the White Phone is the 4595 Number.
- b. The name of the hotspot on the White Phone is “Kyle’s Hotspot.”
- c. Hundreds of user accounts are connected to the White Phone. These include, for example:
  - i. Google usernames “kwhituk12@gmail.com,” “kwhitzigzag12@gmail.com”, “nsftiktok@gmail.com”, and “thehozone12@gmail.com”;
  - ii. CashApp username “thz12345”;
  - iii. Reddit usernames “thehozone,” “kwhituk12,” “kwhituk12@gmail.com,” “kwhitzigzag12”, “nsftadmin”;
  - iv. WishTender username “thehozone12@gmail.com”;<sup>17</sup>
  - v. PayPal username “nsftiktok@gmail.com”;
  - vi. Twitter username “NSFTiktok”;
  - vii. Republic Bank username “kwhituk12”;
  - viii. Venmo username “kwhitzigzag12@gmail.com”;
  - ix. Coinbase username “kwhituk12@gmail.com;” and
  - x. Telegram identifier “5242630950,” among others.
- d. The THZ Admin Telegram account, including groups and channels associated with The Ho Zone, is accessible from the White Phone.

21. Based on my review of the electronic contents of the White Tablet, I have learned the following:

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<sup>16</sup> The White Phone and the White Tablet are just two of numerous devices that were seized during the execution of the WDKY Warrant.

<sup>17</sup> As shown in the screenshot in Paragraph 13 above, WishTender is one method of payment accepted by The Ho Zone.

a. Hundreds of user accounts are connected to the White Tablet. These include, for example:

- i. Reddit usernames “kwhituk12”, “kwhituk12@gmail.com”, “nsftadmin,” “kwhitzigzag12”, “NSFTikTok”, and “thehozone”;
- ii. Venmo usernames “kwhituk12+3@gmail.com” and “TheHoZone”;
- iii. WishTender usernames “kwhitcats12@gmail.com” and “thehozone12@gmail.com”;
- iv. Coinbase username “kwhituk12@gmail.com”;
- v. Republic Bank username “kwhituk12”; and
- vi. Telegram identifier “5242630950,” among others.

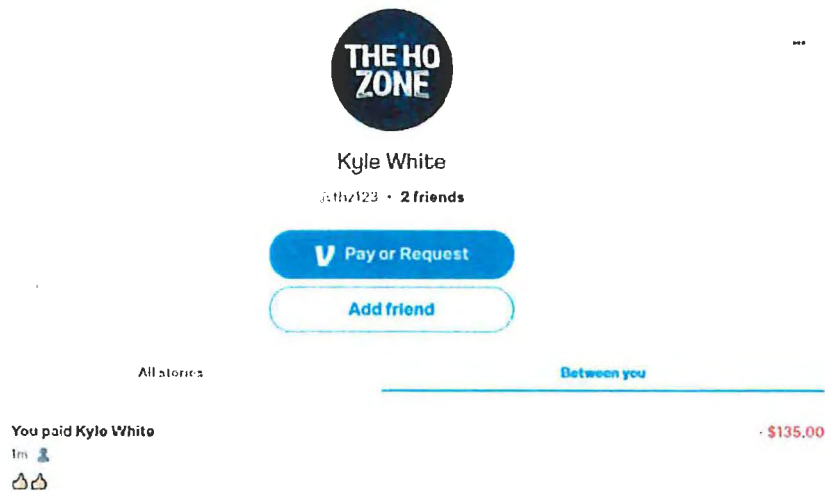
b. The THZ Admin Telegram account, including groups and channels associated with The Ho Zone, is accessible from the White Tablet.

#### **Undercover Purchase of Child Pornography**

22. Based on my conversations with other law enforcement officers and my review of law enforcement reports, communications, images, videos, and other data, I know that on or about September 18, 2023—before the execution of the WDKY Warrant, and at a time when KYLE WHITE, the defendant, still possessed all of his devices—an undercover FBI agent (the “UC”) made a purchase of child pornography from The Ho Zone (the “Controlled Buy”).

a. At the time of the Controlled Buy, the UC was located in New York, New York.

b. In keeping with the instructions on The Ho Zone Payment Guide, the UC sent \$135 on Venmo to the thz123 Venmo Account. Below is a screenshot of this Venmo payment taken by the UC, which lists “Kyle White” as the user of the thz123 Venmo Account.



c. Next, the UC sent a screenshot of the Venmo transaction as proof of payment to THZ Admin and requested access to the following five paid channels:

- i. Minor Victim-1, which costs \$25;
- ii. Minor Victim-2, which costs \$25;
- iii. Minor Victim-3, which costs \$25;
- iv. Victim-1, which costs \$45; and
- v. A semi-professional female athlete (“Victim-8”), which costs \$15.<sup>18</sup>

d. Within 12 minutes after the UC sent proof of payment and requested access to these channels, THZ Admin granted the UC access to all five channels by sending the UC links to each paid channel on Telegram. Below is a screenshot of the chat between THZ Admin and the UC, which was taken by the UC. The username of the UC, the names and monikers of victims, and portions of the links have been redacted.

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<sup>18</sup> Based on my review of open-source news articles, I know that when Victim-8 was 23 years old, an unknown individual hacked Victim-8’s email address, changed her iCloud password, and subsequently leaked sexually explicit videos Victim-8 had made with a sexual partner when she was 18 years old. There is no evidence to suggest that KYLE WHITE, the defendant, hacked Victim-8’s email address. In addition to The Ho Zone, Victim-8’s intimate videos were posted on pornographic websites without her consent.



## THZ Admin (Check Bio)

18 September 2023

[REDACTED] 14:24  
Hi Just sent you a payment for \$135

[REDACTED] can you send me 14:24

[REDACTED] - \$25 14:24

[REDACTED] - \$25 14:24

[REDACTED] - \$25 14:24

[REDACTED] - \$45 14:24

[REDACTED] - \$15 14:24

 14:26

 **THZ Admin (Check Bio)** 14:35

[REDACTED] : [https://t.me/+isu\[REDACTED\]](https://t.me/+isu[REDACTED])

[REDACTED] : [https://t.me/+4Ec\[REDACTED\]](https://t.me/+4Ec[REDACTED]) 14:35

[https://t.me/+M8\[REDACTED\]](https://t.me/+M8[REDACTED]) 14:36

[REDACTED] : [https://t.me/+j\[REDACTED\]](https://t.me/+j[REDACTED]) 14:36

[https://t.me/+N\[REDACTED\]](https://t.me/+N[REDACTED]) 14:36

[REDACTED] 14:37

[REDACTED] TY

e. Based on my review of the electronic contents of the White Phone, I know that this two-person Telegram message between the UC and THZ Admin is on the White Phone. The chats the UC received from the THZ Admin user appear in the message thread on the White Phone as being sent by Telegram user “5242630950.” As discussed above in Paragraphs 20 and 21, “5242630950” is a Telegram identifier associated with WHITE.

23. Based on my review of the Ho Zone Telegram channel featuring Minor Victim-1 (the “Minor Victim-1 Channel”), I know that on or about September 18, 2023, the Minor Victim-1 Channel had 98 subscribers, which means that 98 people at that time had access to the child pornography depicted on the channel. The Minor Victim-1 Channel was created on or about December 3, 2022.

a. The content on the Minor Victim-1 Channel depicts a minor girl (Minor Victim-1) and a minor boy (“Minor Victim-4”) engaging in sex acts with each other. The content also depicts Minor Victim-1 engaging in sex acts with herself.

b. Based on conversations I have had with other law enforcement officers familiar with the content on the Minor Victim-1 Channel, I know that at the time the content was created, Minor Victim-1 was approximately 15 years old, and Minor Victim-4 was her younger brother, who was approximately 11 years old.

24. Based on my review of the Ho Zone Telegram channel featuring Minor Victim-2 (the “Minor Victim-2 Channel”), I know that on or about September 18, 2023, the Minor Victim-2 Channel had 41 subscribers, which means that 41 people at that time had access to the child pornography depicted on the channel. The Minor Victim-2 Channel was created on or about October 13, 2022.

a. The content on the Minor Victim-2 Channel depicts a minor girl (Minor Victim-2) engaging in sex acts with herself.

b. Based on conversations I have had with other law enforcement officers familiar with the content on the Minor Victim-2 Channel, I know that at the time the content was created, Minor Victim-2 was approximately 14 to 16 years old.

25. Based on my review of the Ho Zone Telegram channel featuring Minor Victim-3 (the “Minor Victim-3 Channel”), I know that on or about September 18, 2023, the Minor Victim-3 Channel had 80 subscribers, which means that 80 people at that time had access to the child pornography depicted on the channel. The Minor Victim-3 Channel was created on or about September 29, 2022.

a. The content on the Minor Victim-3 Channel depicts a minor girl (Minor Victim-3) performing sex acts on a minor boy (“Minor Victim-5”). The content also depicts Minor Victim-3 engaging in sex acts with herself.

b. Based on conversations I have had with other law enforcement officers familiar with the content on the Minor Victim-3 Channel, I know that at the time the content was created, Minor Victim-3 was approximately 15 years old, and Minor Victim-5 was her younger brother, who was approximately 13 years old.

#### **KYLE WHITE Knowingly Advertised and Sold Child Pornography**

26. As described below, I believe KYLE WHITE, the defendant, knew that what he advertised, sold, and gave people access to on The Ho Zone included child pornography.

27. As described further above in Paragraph 10(c), the description on The Ho Zone of the Minor Victim-3 Channel includes the following: “Blackmailed into getting fingered by and sucking her little brother’s dick.” I believe this reference to “little brother” indicates that WHITE has viewed this content and believes it to show a minor male child engaging in sexually explicit conduct.

28. Based on my participation in this investigation and my participation in the execution of the WDKY Warrant, I know that during the execution of the WDKY Warrant, the FBI seized a laptop from the residence of KYLE WHITE, the defendant. A one-terabyte external drive was plugged in to the laptop at the time of the search (the “White Drive”).

29. Based on my review of the electronic contents of the White Drive, I have learned, among other things, the following:

a. The White Drive contains a subfolder called “CoolPpl.” The “CoolPpl” folder contains approximately 3,773 files, which consist largely of videos.

b. Although I did not open every file in the “CoolPpl” folder, I opened a sampling of approximately 100 files. Each file that I opened appeared to contain sexually explicit depictions of minors. Some files contained videos and images of individuals who appeared to be teenagers and could potentially be over 18 years of age, but many of the files appeared to contain obvious, prepubescent minors, including toddlers.

c. Some of the file names in the “CoolPpl” folder are nondescript, but many of them suggest that the files contain sexually explicit depictions of minors. For instance, just some of the file names include: “teen vids,” “2 white tods,”<sup>19</sup> “adolescent,” “cp niña mamanda a hombre adolescente,”<sup>20</sup> “my granddaughter,” and “mom and son first try.”

30. Based on my participation in the review of the electronic contents of the White Phone, I have learned, among other things, the following:

a. The White Phone contains a note that was created on or about April 8, 2023 and modified on June 14, 2023. In relevant part, the note reads:

[T]hroughout the vid . . .  
say Kyle everytime [sic] (most important part) . . . .  
Tell me to cum FOR (not on) your tiny little 15 yr old boobies and body and shake your  
ass for me . . . .  
Say “we love you kyle” then make out and then “say we love you soo much kyle”  
Suck on each other’s nipples . . . .  
But most importantly I want you to say my name ALOT [sic] in the vids. Say things like:  
Cum for me/us Kyle  
Jerk off for me/us Kyle  
You like that/my titties/pussy Kyle?  
Ur such a good boy Kyle  
I love you Kyle<sup>21</sup>

<sup>19</sup> I believe “tods” is a reference to the word “toddlers.”

<sup>20</sup> According to Google Translate, this Spanish phrase roughly translates to “cp girl blowjob teen man.” Even assuming that KYLE WHITE, the defendant, has no knowledge of Spanish and did not consult Google Translate or another translation service, the Spanish word for “adolescent” is only one letter different from the English word. Moreover, this file name contains the words “cp,” which is a commonly known abbreviation for “child pornography.”

<sup>21</sup> Based on my training and experience, I believe that this appears to be a script or instructions given by KYLE WHITE, the defendant, to a minor or multiple minors directing the minor/minors to create a sexually explicit video. To date, law enforcement has not recovered such a video.

b. On or about December 26, 2022, WHITE exchanged the following messages on Telegram with another Telegram user (“Individual-1” or “Indiv-1”):

Indiv-1: You have anyone like [Minor Victim-6]?  
WHITE: U mean UA girls?  
Indiv-1: Idc just blondes with good videos  
If UA would be better  
Got anything like that?  
WHITE: Yeah alot [sic]  
U seen [Minor Victim-7] already?  
Indiv-1: No  
What’s she look like?  
WHITE: [Telegram link]  
Indiv-1: . . .  
How old is [Minor Victim-7]?  
WHITE: She was 16 in those vids I think. I just say 18 so ppl don’t report it  
. . .  
Indiv-1: If you have anyone else similar let me know and I’ll buy those too  
WHITE: I got this girl too. She only has like 5 vids  
[Image file]

c. Between on or about January 6, 2023 and January 7, 2023, WHITE and Individual-1 exchanged the following messages on Telegram:

Indiv-1: Got any new UA?  
. . .  
WHITE: There’s some in here  
[Telegram link]  
. . .  
Indiv-1: Also word of the wise keep UA off your main pages  
. . .  
WHITE: Yeah ik.<sup>22</sup> That’s why the Most popular one<sup>23</sup> got taken down. I’m making a secret private channel for it now. . . .

d. On or about February 20, 2023, WHITE exchanged the following messages on Telegram with another Telegram user (“Individual-2” or “Indiv-2”):

Indiv-2: How old is that [Minor Victim-8] girl?  
WHITE: [Telegram link to channel of Minor Victim-7]  
Older than her lol  
Indiv-2: Yea I did NOT expect [Minor Victim-7] to be that age  
WHITE: Lol i think [Minor Victim-8] is like 17

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<sup>22</sup> I believe “ik” is an abbreviation for “I know.”

<sup>23</sup> I believe this is a reference to The Ho Zone “MOST POPULAR GIRLS LISTS” channel.



e. On or about April 11, 2023, WHITE exchanged the following messages on Telegram with another Telegram user (“Individual-3” or “Indiv-3”):

Indiv-3: Btw please just say you won’t send me something if anything I ask for is UA. I don’t wanna know, i just I don’t wanna look at it. That’s why I dropped [Minor Victim-9] cause I didn’t know and felt weird. Other teen leaks<sup>24</sup> gives me anxiety Lmao

WHITE: Ight I gotchu lol  
There’s rilly no way of knowing how old the girls are in the leaks tbh  
Even if Ik their current age, the content could be from 3 yrs ago for all Ik

Indiv-3: As long as it’s nothing guaranteed UA I’m good. I’m not cool w that jazz so just don’t send it my way and I’ll appreciate you

WHITE: Gotchu  
Just avoid that black market<sup>25</sup> channel I made

...  
Indiv-3: Good to know gonna avoid that one  
Just gonna avoid that channel from this point on honestly

WHITE: Prob a good idea lol  
...  
I don’t like sellin that stuff but ppl keep buyin it so it’s whatever I guess as long as their not like actual kids

Indiv-3: Big dog honestly, the money ain’t worth it for that type of shit  
That’s big time jail.

Not just tax evasion type shit  
Tax evasion you do okay in jail, chomo<sup>26</sup> shit you don’t make it out  
WHITE: Yeah ik. I rilly need to stop but every time I goto [sic] to delete them someone buys another and I’m like shit  
Prob made over \$10k off the girls in that black market

Indiv-3: Brother just delete the channels . . . .  
Those are folk you don’t wanna be associated with. It’ll get you into deep shit.  
Like yeah it’ll lose you some money but you’re not committing “get killed” felonies

...  
WHITE: Yeah ik I will soon. It’s just easier said than done givin up \$1,000’s  
...  
How risky even is it tho? Like they gonna lock me up for selling some 16 yr olds nudes on here? There’s tons of ppl postin the same shit. I’m sure the feds got more important things to worry abt lol

---

<sup>24</sup> I believe this is a reference to The Ho Zone Other Teen (18+) Leaks channel.

<sup>25</sup> I believe this is a reference to The Ho Zone THZ Black Market channel.

<sup>26</sup> Individual-3 explains later in this chat thread that “chomo” means “[p]edo shit. Stands for child molester but it doesn’t just mean kid diddler[.]”

[L]uckily I never put watermarks or anything on them like some dumbasses did so no one will be able to trace it back to me later

...

Like where do I draw the line tho? U sayin just sell ONLY from OF?<sup>27</sup> Cuz that'd cut my earnings in half

Indiv-3: Nah bro leaks are fine 18+ to your knowledge. As long as you're pretty sure they're solid don't worry about it.

WHITE: Then I can use the ole "officer I swear I thought she was 18" defense lmao

Indiv-3: As long as you genuinely believe it and do your due diligence to make sure

WHITE: It's still gotta be illegal for me to sell em without their consent even if they are 18 tho, right? Like I'm breakin the law regardless

Indiv-3: It is but it isn't get murdered in jail illegal

...

WHITE: I'll take em down from the market but I'm not gonna delete the actual channels cuz ppl already paid for those

...

As long as I'm not advertising them publicly no one will know they even exist

f. On or about April 12, 2023, WHITE exchanged the following messages on Telegram with another Telegram user ("Individual-4" or "Indiv-4"):

WHITE: You talking abt the girl I posted? She was def underage

Indiv-4: ??

Which girl?

WHITE: [Telegram link]

Indiv-4: Oh I'm not in blackmarket [sic] anymore. I think you gotta invite me

WHITE: [Telegram link]

g. On or about April 13, 2023, WHITE exchanged the following messages on Telegram with another Telegram user ("Individual-5" or "Indiv-5"):

Indiv-5: Is the [Minor Victim-3] set really blackmail videos and her younger brother? If [sic] come across a few that say blackmail but they weren't. Just wanna make sure their [sic] real and thats really her brother before I pay for it

WHITE: Oh yeah she was deff blackmailed and it's deff her brother. I saw a family portrait

Indiv-5: Oh shit, where is the family portrait and how old was he

...

WHITE: [Image file]

...

Indiv-5: Shit that's crazy, how old was her brother

WHITE: No clue but he looks pretty young

...

Indiv-5: Do you have anymore blackmail sets besides the ones already listed

---

<sup>27</sup> I believe "OF" is an abbreviation for OnlyFans.

WHITE: Yeah a bunch

Indiv-5: ...  
And what about more sister and brother

WHITE: ...  
Might have a couple somewhere. These [sic] are harder to find

On or about August 3, 2023, WHITE notified Individual-5, "I got more" blackmail and/or sister and brother videos.

h. On or about April 28, 2023, WHITE sent the following message on Telegram to Individual-4, in relevant part: "No UA girl has ended up on [Website-1] bc of me and I only sold like 15 of em not 150."

i. On or about June 22, 2023, WHITE exchanged the following messages on Telegram with another Telegram user ("Individual-6" or "Indiv-6"):

Indiv-6: Is the [Minor Victim-10] sextape actually [sic] her  
And how old is she

WHITE: Yeah and idk her tiktok bio says [sic] 18 but she says she's 15 in one of the vids i think

j. On or about June 27, 2023, Individual-4 sent the following message on Telegram to WHITE: "Well you ran a reasonably successful online emporium. That took some guts[.]" WHITE responded: "I've made over 300k in the first year. That's an understatement lol[.]"

k. Between on or about July 24, 2023 and July 26, 2023, after an individual familiar to WHITE and Individual-4 was arrested by the FBI, WHITE and Individual-4 exchanged the following messages on Telegram:

WHITE: I'd just have to get a good lawyer but there's no real evidence I sold CP or did anything illegal

Indiv-4: You might get exposed to a civil suit  
THZ after dark or whatever is iffy though  
I'm like 95% sure some of the girls like [Minor Victim-7] have UA shit

WHITE: ...  
Yeah put [sic] can u prove that that's the case and that ik abt it in a court of law

Indiv-4: I think so. You had a THZ cashapp at one time  
trust me, you're not in a precarious state legally, but you wouldn't be bulletproofed against criminal proceedings

WHITE: ...  
If he actually does alert the FBI to me that could be bad tho

...  
Is there anything in there abt how the FBI caught him that i should try to avoid doing?

Indiv-4: ...  
hmm. I'm not sure what it was that made the agents target him

WHITE: its good you are crypto only  
I'm not tho  
t.me/nsfttpaymentguide

Indiv-4: I thought you dropped the other methods  
IDK man, how many times have I said itm's [sic] important to interview buyers  
I'm sure I could have spotted those agents

WHITE: I got way too many to do that

Indiv-4: IDK what to tell you. It's possible you could get pinched for selling UA sets . . .  
If you want to sell on cashapp you have to get rid of the UA

WHITE: I don't use cashapp anymore

Indiv-4: Apple Pay and Zelle are equally if not more traceable

WHITE: I try to keep a pretty low profile. Only like 9k subs<sup>28</sup> in the main market.  
Doubt I'll draw any law enforcement attention unless someone tips them off...  
What if I post sum like "Disclaimer: As far as I know all of these girls are atleast [sic] 18. If you're aware of any that aren't pls lmk"<sup>29</sup>  
Feel like that might protect me

Indiv-4: Ehhhh in a court of law that would be tough to prove that you had no idea

WHITE: Tough to prove that I DID tho too

Indiv-4: You have a video of [Minor: Victim-11] where she says shes 14  
like it's not that easy to wriggle out of it on a technicality

WHITE: Not in the main market tho

Indiv-4: The UA sets could ruin your life if those same undercover agents had hit you up

WHITE: Yeah fuck i should just remove em  
. . .  
Just sucks cuz those sell alot [sic] lol  
. . .  
Also I meant that msg would probably turn off any feds too. unless they somehow recognize the girls and know they're under 18, they'd prob just take my word for it and move on

---

<sup>28</sup> I believe "subs" refers to Telegram subscribers.

<sup>29</sup> WHITE sent this message to Individual-4 on or about July 26, 2023. As described above in Paragraph 9(e), on or about July 30, 2023, THZ Admin added a "Legal Disclaimer" to the "Other Teen (18+) Leaks" channel claiming that "[t]hese girls are all 18+ as far as I know."

WHEREFORE, I respectfully request that a warrant be issued for the arrest of KYLE WHITE, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



NICOLE KWASNAZA  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this 14 day of January, 2024.



THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York