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AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20) ☐ Original ☐ Duplicate Original

LODGED
CLERK, U.S. DISTRICT COURT
11/5/2026
CENTRAL DISTRICT OF CALIFORNIA
BY: AR DEPUTY

UNITED STATES DISTRICT COURT

for the

Central District of California

FILED
CLERK, U.S. DISTRICT COURT
11/05/2026
CENTRAL DISTRICT OF CALIFORNIA
BY: cld DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS WAYNE MARKLE,

Defendant.

Case No. 2:26-mj-06499-DUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of October 30, 2026, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section	*Offense Description*
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ [redacted]
Complainant's signature

[redacted] FBI Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: November 5, 2026

[redacted]
Judge's signature

City and state: Los Angeles, California

Hon. Rozella A. Oliver, U.S. Magistrate Judge
Printed name and title

AUSAs:
Kathy Yu / Kevin J. Butler / Daniel H. Weiner

AFFIDAVIT

I, [redacted] being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and have been so employed since August 2025. I am currently assigned to the Violent Crimes Against Children ("VCAC") unit in the Los Angeles Field Office, where I investigate matters regarding the sexual exploitation of children and child pornography. During my career, I have led and participated in numerous VCAC investigations wherein I have used a variety of investigative techniques and resources, to include the execution of search and arrest warrants and the review of physical and digital evidence collected from those warrants. I have received both formal and on-the-job training from more experienced senior agents, to include specialized training in the sexual exploitation of children. I have observed and reviewed images of child pornography as defined in 18 U.S.C. § 2256 in many forms of media, including physical and digital media.

2. Through my training and experience, I have become familiar with methods used by people who commit offenses related to the sexual exploitation of children including the use of the internet and digital devices to facilitate, and commit, those offenses. As a federal agent, I am authorized to investigate violations of laws in the United States, and as a law

enforcement officer, I am authorized by law to request and execute arrest warrants issued by federal courts.

II. PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint against, and arrest warrant for, THOMAS WAYNE MARKLE (hereafter "MARKLE") for a violation of 18 U.S.C. § 2252A(a)(5)(B): Possession of Child Pornography, committed on or about October 30, 2026.

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all 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, all dates and times are on or about those indicated, and all amounts are approximate.

III. SUMMARY OF PROBABLE CAUSE

5. As set forth in greater detail below, there is probable cause to believe MARKLE knowingly possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

6. In October 2026, the FBI received reports from different witnesses regarding MARKLE. For example, the FBI learned that Witness 1 had signed an affidavit regarding their discovery of suspected child pornography among MARKLE's

possessions in the Philippines. The FBI also interviewed Witness 2, who disclosed that MARKLE rented a storage unit at a particular location[1] within the Central District of California.

7. In the course of the investigation, the FBI identified and searched, pursuant to federal search warrants, two storage units registered to MARKLE within the Central District of California.

a. At the first storage unit registered to MARKLE, the FBI seized approximately 27 items, including but not limited to materials (slides, film negatives, books) that contain suspected child pornography. While agents have not yet completed their review of this evidence, they were able to convert some of the film negatives into color digital photographs and discovered suspected child pornography.

b. At the second storage unit registered to MARKLE, the FBI seized approximately 51 items, including but not limited to materials (slides, film negatives, books) that contain suspected child pornography.

IV. STATEMENT OF PROBABLE CAUSE

8. Based on my own involvement in this investigation, consultation with other law enforcement officers, review of law

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[1] I am aware of the identities of the witnesses referenced herein and the locations described; however, to protect the safety and privacy of those individuals and to avoid unnecessarily disclosing sensitive locations, I have anonymized identifying information in this affidavit. The true identities of the witnesses and locations are known to me and can be provided to the Court upon request.

enforcement reports, and review of records, I am aware of the following:

A. FBI Discovers Storage Unit 1 Used by MARKLE to Store Suspected Child Pornography Collection

9. In October 2026, FBI agents interviewed Witness 2, who disclosed that MARKLE rented a storage unit at a particular location ("Storage Unit 1") within the Central District of California. On October 30, 2026, the FBI obtained a federal search warrant for Storage Unit 1, authorized by the Honorable Daniel S. Roberts, United States Magistrate Judge for the Central District of California (Case No. 2:26-MJ-06371).

a. Based on records obtained via subpoena by the FBI, MARKLE had rented Storage Unit 1 since approximately July 2008, with the most recent payment, made by autopay, on or about October 14, 2026. MARKLE's use of Storage Unit 1 was also corroborated by items found within the unit bearing his name, including boxes labeled "Tom Markle" and an address within the Central District of California.

b. In executing the search warrant at Storage Unit 1, agents seized approximately 27 items, including but not limited to materials (slides, film negatives, books) that contain suspected child pornography.

10. To investigate the suspected child pornography further, I viewed a collection of what appeared to be strips of 35mm film negatives seized from Storage Unit 1 registered to MARKLE. To date, I have identified approximately 18 images that

appeared to constitute child pornography. The investigation is active and ongoing.

11. To confirm my visual observations, on November 2, 2026, I utilized a Nikon LS-5000 ED Scanner[2] and VueScan software[3] to convert the film negatives into color digital photographs. Based on my training and experience, using these tools -- Nikon LS-5000 ED Scanner and VueScan software -- does not alter the content of the film negatives. It enables the user to see the image captured by the original 35mm film negative, while adjusting for color and clarity. For example, film negatives typically have a dark orange tint. VueScan calculates how to remove the orange color, and processes the image so that it appears as it was originally captured.

12. Among the digitized images, I viewed the following:

a. IMAGE 1: An image of an adult man wearing a white button-down shirt and blue jeans sitting on a white surface. A nude pre-pubescent girl is sitting on the adult man's lap so that her back is against his left chest. The girl's legs are spread toward the camera and hooked onto the outside edges of the adult man's knees. The adult man's left hand is positioned on the girl's left thigh, and the adult man's

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[2] Based on my training and experience, the Nikon Super CoolScan 5000 ED (LS-5000 ED) is a high-speed, high-resolution desktop film and slide scanner introduced by Nikon to digitize 35mm film strips, mounted slides, and APS film.

[3] Based on my training and experience, VueScan is a universal third-party scanning and image-processing software that includes built-in tools for detecting and converting color negatives.

right hand reaches around the girl's body and touches the girl's exposed vagina with his right middle finger. The adult man appears to be in the age range of 30s to 40s.

i. Based on my training and experience, the girl pictured in IMAGE 1 is pre-pubescent based on her lack of breast development, lack of pubic hair, and relatively small body size. The focal point of IMAGE 1 appears to be the child's exposed vagina and the adult man's touching of her exposed vagina -- particularly given that he is fully clothed and she is not. The child's nudity, pose, and the adult man's actions appear designed to elicit a sexual response from the viewer.

b. IMAGE 2: An image of an adult man wearing a white button-down shirt and blue jeans lying on a bed. The adult man is positioned on his left side and is using his left hand to prop his head up with his elbow on the bed surface. A nude pre-pubescent girl is lying in front of him so that her back is pressed against his chest. The girl is positioned on her left side with her left leg straight and her right leg hooked over the man's left hip so that her legs are spread and her vagina is exposed to the camera. The adult man has his right arm wrapped around the girl's hips and he appears to be looking down at her nude body.

i. Based on my training and experience, the girl pictured in IMAGE 2 is pre-pubescent based on her lack of breast development, lack of pubic hair, and relatively small body size. The focal point of IMAGE 2 appears to be the child's exposed vagina. Additionally, the child is nude and positioned

[redacted]associated with sexual activity -- again, particularly given that he is fully clothed and she is not. The child's pose suggests sexual coyness and appears to be designed to elicit a sexual response in the viewer.

c. IMAGE 3: An image of a nude pre-pubescent girl sitting on a bed. The girl is positioned facing the camera with her right leg spread and her left leg bent so that her left foot is touching her right thigh. The girl's vagina is exposed to the camera. The girl's right elbow is positioned on what appears to be a bar swing above the bed consisting of two vertical and one horizontal black bars. The girl's left hand is positioned near her pubic area so that her left elbow is bent. Her left shoulder is shrugged up towards her face, appearing to be in a suggestive manner. Behind the girl, a second partially clothed female is seen lying on the bed with her feet propped on the bar swing. The second female's age is indeterminate.

i. Based on my training and experience, the girl pictured in IMAGE 3 is pre-pubescent based on her lack of breast development, lack of pubic hair, and relatively small body size. The child is nude and positioned in an unnatural pose in a place associated with sexual activity. The child's pose suggests sexual coyness and appears to be designed to elicit a sexual response in the viewer.

B. FBI Identifies MARKLE in the Images of Suspected Child Pornography

13. To corroborate the identity of the man pictured in IMAGES 1 and 2 identified above, on November 5, 2026, I

interviewed Witness 3, who has known MARKLE since the 1970s. Witness 3 reviewed redacted versions of IMAGES 1 and 2 in which only the adult man was shown. Witness 3 positively identified the adult man as MARKLE.

14. I then compared MARKLE in IMAGES 1 and 2 to additional images found within Storage Unit 1 and I believe they depict him, along with children in various stages of undress. The information provided by Witness 3, including their identification of the man in IMAGES 1 and 2 as MARKLE, is further corroborated by, among other things, the location where the film negatives were found (in a storage unit registered to MARKLE and paid for by MARKLE) as well as my own review of photographs of MARKLE.

C. FBI Investigates the 35mm Film

15. To learn more about the 35mm film used to capture these images of MARKLE with children, I examined the 35mm film and noticed it contained the markings "K·ODAK CP 100 594" and "K.ODAK CP 100 594" along the edges of the film. I then researched these markings and learned the following:

a. According to an April 2013 publication titled "A Guide to Identifying Year of Manufacture for KODAK Motion Picture Films" published by Eastman Kodak Company,[4] a customer

[4] Based on my training and experience, Eastman Kodak Company is an American technology and manufacturing company headquartered in Rochester, New York, which became globally known in the photographic film and camera industry for much of the 20th century.

can determine the manufacturing location of their film utilizing the Plant of Origin dots found within the "KODAK" marking.

b. Here, a dot between the first "K" and the "O" indicates the film was manufactured in either New York or Colorado -- that is, outside the State of California. If the dot is located towards the top of the letters, for example "K·ODAK CP 100 594," the film was manufactured in New York. If the dot is located towards the bottom of the letters, for example "K.ODAK CP 100 594," the film was manufactured in Colorado.

c. The film negatives depicting IMAGES 1 through 3 bear these markings. Accordingly, the film on which those images were captured was manufactured outside the State of California and traveled in interstate commerce before MARKLE possessed the images in the Central District of California.

D. FBI Investigates the Location Pictured in IMAGE 3

16. To learn more about where IMAGE 3 was taken, I examined the objects pictured in the background of the room. There were several objects such as a pink lamp, diamond-shaped lattice work on the wall, and a tray of room service items that were pictured in a series of other photos appearing to depict the same two females depicted in IMAGE 3. In another image from this series, I viewed a logo on one of the pillows from the bed. After reviewing multiple images in which this logo is seen on a pillow, I determined it to read "Anahaw Lodge." I then researched Anahaw Lodge and learned the following.

17. According to a November 21, 2016 article from The Philippine Star,[5] Anahaw Lodge was part of a motel and hotel chain empire in the Philippines established by Angelo King ("KING"). The article was written to memorialize KING's accomplishments, describing him as a businessman who "changed the landscape of motel industry in the Philippines" throughout the 1970s and 1980s.

E. FBI Discovers Storage Unit 2 Used by MARKLE to Store Additional Suspected Child Pornography Collection

18. Based on additional information obtained from Witness 1 regarding additional storage units within the Central District of California where MARKLE stored items, on November 4, 2026, the FBI obtained a federal search warrant for a second storage unit ("Storage Unit 2"), authorized by the Honorable Rozella A. Oliver, United States Magistrate Judge for the Central District of California (Case No. 2:26-MJ-06460).

a. Based on records obtained via subpoena by the FBI, MARKLE had rented Storage Unit 2 since approximately June 2008, with the most recent payment, made by autopay, on or about October 20, 2026. MARKLE's use of Storage Unit 2 was also corroborated by items found within the unit, to include pieces of mail bearing the name "Thomas Markle" and an International Driver's Permit which contained MARKLE's name, date of birth, and a photo appearing to depict MARKLE.

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[5] Based on my training and experience, The Philippine Star is a major English-language daily broadsheet newspaper in the Philippines.

b. In executing the search warrant at Storage Unit 2, agents also seized approximately 51 items, including but not limited to materials (slides, film negatives, books) that contain suspected child pornography.

V. BACKGROUND ON CHILD EXPLOITATION OFFENSES, COMPUTERS, DEFINITION OF TERMS, AND TRAINING AND EXPERIENCE REGARDING CHILD EXPLOITATION CRIMES

19. In this affidavit, the terms "minor," "sexually explicit conduct," "visual depiction," "producing," and "child pornography" are defined as set forth in 18 U.S.C. § 2256. The term "computer" is defined as set forth in 18 U.S.C. § 1030(e)(1).

a. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where: (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct; (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct; or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

b. "Minor," as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

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

d. "Visual depiction," as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

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VI. CONCLUSION

20. For all the reasons described above, there is probable cause to believe that MARKLE violated 18 U.S.C. § 2252A(a)(5)(B): Possession of Child Pornography, on or about October 30, 2026.

/s/ [redacted]
[redacted]
Special Agent
Federal Bureau of Investigation

The magistrate judge has viewed the images described in paragraph 12 (IMAGE 1, IMAGE 2, IMAGE 3), above, that the affiant alleges are lascivious and, thereafter, placed them inside a sealed envelope and initialed across the seal. The affiant has taken custody of the envelope and will maintain custody until all appeals have been exhausted.

[redacted]
HONORABLE ROZELLA A. OLIVER
UNITED STATES MAGISTRATE JUDGE

Subscribed to and sworn before me this 5th day of November 2026

[redacted]
HONORABLE ROZELLA A. OLIVER
UNITED STATES MAGISTRATE JUDGE