
UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-mj-422 KMM

JESSICA LYNN WHITE

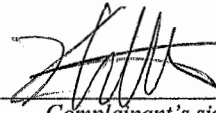
CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 28, 2020, in Ramsey County, in the State and District of Minnesota, defendant

conspired with Co-Conspirator 1 and Co-Conspirator 2 to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 371 (Count 1)

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Complainant's signature

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime and email
pursuant to Fed. R. Crim. P. 41(d)(3).

Kylie Williamson, Special Agent

Printed name and title

Date:

June 16, 2020

Judge's Signature

City and State: Minneapolis, MNKate M. Menendez
United States Magistrate Judge

Printed Name and Title

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-mj-422 KMM

JESSICA LYNN WHITE

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) JESSICA LYNN WHITE,

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

On or about May 28, 2020, in Ramsey County, in the State and District of Minnesota, defendant conspired with Co-Conspirator 1 and Co-Conspirator 2 to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 371 (Count 1)

Date: June 16, 2020



Issuing officer's signature

City and State: Minneapolis, MN

Kate M. Menendez
United States Magistrate Judge

Printed Name and Title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

STATE OF MINNESOTA

ss.

AFFIDAVIT OF
KYLIE WILLIAMSON

COUNTY OF HENNEPIN

**AFFIDAVIT IN SUPPORT AN APPLICATION
FOR A COMPLAINT AND ARREST WARRANT**

I, Special Agent Kylie Williamson, being duly sworn, state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and am thus an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I have been employed as a Special Agent by the ATF since August of 2007. Prior to that, I was employed by ATF for two years as an Industry Operations Investigator.

2. I am currently assigned to the Saint Paul Field Office. In my capacity as a Special Agent with the ATF, I have participated in numerous criminal investigations of individuals and entities related to violations of Federal Laws, particularly those under Titles 18, 21, and 26 of the United States Code. In my capacity as an ATF Special Agent I have received on-going training related to criminal investigations to include crimes involving gang activity, firearms violations, drug trafficking, arson, bombings, money laundering, undercover operations, Title III wiretaps, as well as electronic and physical surveillance procedures. I work with various law enforcement agencies and drug task forces throughout the state of Minnesota and have supervised, led, and/or otherwise been a part of hundreds

of arrests and search warrants during my years as a law enforcement officer.

3. In my capacity as a Special Agent with the ATF, my responsibilities include, but are not limited to, investigating firearms, arson, and explosives violations under Title 18 of the United States Code. During my time with the ATF, I have assisted in the investigation of multiple cases falling within the ATF's Arson and Explosives jurisdiction. I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and the Special Agent Basic Training at the ATF National Academy. I have received significant amounts of training on the subject-matter within the ATF's jurisdiction, including courses in criminal investigations, federal firearms violations, federal arson laws, and federal explosives laws.

4. The facts in this Affidavit are based on my personal observations, my training and experience, evidence gathered pursuant to search warrants, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested search warrant and does not set forth all of my knowledge about this matter.

5. This affidavit is being submitted in support of the criminal complaint for Jessica Lynn WHITE. Based on my training, experience, participation in criminal investigations and the facts set forth in this Affidavit, I respectfully submit that there is probable cause to believe that Jessica WHITE conspired with her juvenile son, AJW, and a third, unidentified Co-Conspirator, to commit arson in violation of Title 18 U.S.C, Section 844(i), all in violation of Title 18 U.S.C., Section 371; and that Co-Conspirator 1

has attempted to destroy by fire, property used and engaged in interstate commerce, in violation of Title 18, U.S.C., Section 844(i).

PROBABLE CAUSE

6. On Monday, May 25, 2020, George Floyd died while in the custody of the Minneapolis Police Department. The nature and circumstances of Mr. Floyd's arrest, subsequent death, and the actions of the Minneapolis Police Department came under intense public scrutiny.

7. During Mr. Floyd's encounter with police on May 25, multiple bystanders gathered around the scene. At least one bystander filmed the incident, and shortly after it occurred, posted a video on social media that soon went viral. By Tuesday morning, May 26, local and national news outlets had picked up the story about Mr. Floyd's death, and by Tuesday afternoon, thousands of people were gathered in the area of 38th and Chicago Avenue to protest the treatment of Mr. Floyd.

8. Following the mostly peaceful protests that occurred on Tuesday night, the Cities of Minneapolis and St. Paul, and some surrounding communities, endured three nights of violence and destruction. Between Wednesday night and the early hours of Saturday morning, following several organized and peaceful protests, hundreds of individuals carried on into the night, vandalized and looted local businesses, and destroyed buildings, vehicles, and other property through arson, smashing doors and windows, and throwing objects.

9. As of Saturday morning, May 30, the Minneapolis Star Tribune reported that approximately 246 businesses across the Twin Cities area had been vandalized, looted, partially or completely destroyed by fire, or otherwise damaged. In the city of St. Paul, the majority of the damaged buildings were located along University Avenue in the Hamline/Midway neighborhood.

10. One of the businesses that was impacted by the above-referenced events was Enterprise Rent-A-Car located at 1161 University Avenue West, St. Paul, Minnesota (“Enterprise”). On May 28, 2020, a fire was started inside the building. The St. Paul Fire Department arrived and attempted to extinguish the fire, but the building was completely destroyed. On June 3, 2020, ATF’s National Response Team (NRT) examined the scene. The cause of the fire was deemed incendiary by an ATF Certified Fire Investigator (CFI) who also concluded that the fire originated from at least one area within the interior of the structure.

11. During this investigation I have found evidence that shows three individuals conspired to commit arson at Enterprise, and did aid and abet each other in committing that arson.¹ On May 28, 2020, Enterprise’s surveillance cameras positioned inside and outside of the business at 1161 University Avenue West, captured footage of Co-Conspirator 1, and another individual identified as VJW (who is a juvenile) entering and exiting the Enterprise

¹ The investigation also revealed that, in addition to the three suspects described herein, witnesses observed a separate group of individuals who attempted an arson by throwing a Molotov cocktail onto the roof of Enterprise. ATF Certified Fire Investigators (CFIs) found evidence of a localized fire on the roof of the Enterprise building, which corroborated that report. However, ATF CFIs determined that the fire, which destroyed the building, originated from at least one area within the interior of the structure.

two different times as a third person, identified as Jessica Lynn WHITE, waited outside of the building. Just before Co-Conspirator 1 and VJW exited Enterprise for the last time, fire can be seen flickering in the reflection of the front window. After Co-Conspirator 1 and VJW exited, the fire can be seen progressing, again, in the reflection of the front window of the business. Within minutes of Co-Conspirator 1 and VJW exiting the building, the front office is filled with smoke, which is also seen pouring out of the front of the building.

12. Specifically, the camera positioned on the entrance of the store shows Co-Conspirator 1 opening the door to the Enterprise, with his arms inside of his t-shirt, and entering the Enterprise at approximately 8:44 p.m. Numerous people, including Co-Conspirator 1 and VJW, enter the business as Jessica WHITE waits outside.

13. Co-Conspirator 1 is wearing a gray t-shirt with his arms concealed inside of the t-shirt, a black hat, light colored face mask, blue jeans, and dark shoes. VJW is a male with dark, shaggy hair, wearing a black and white bandana, a black t-shirt with "Andover" clearly legible on the front of it, black shorts, blue shoes and a black backpack. Jessica WHITE is a female with blue or green hair, wearing a hat, a black and white bandana, a black t-shirt, black pants, and black shoes.

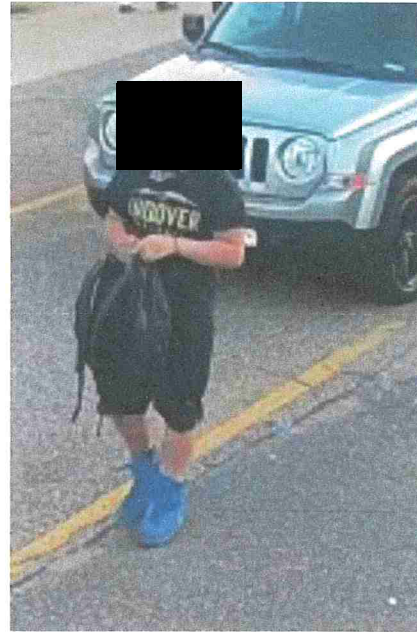
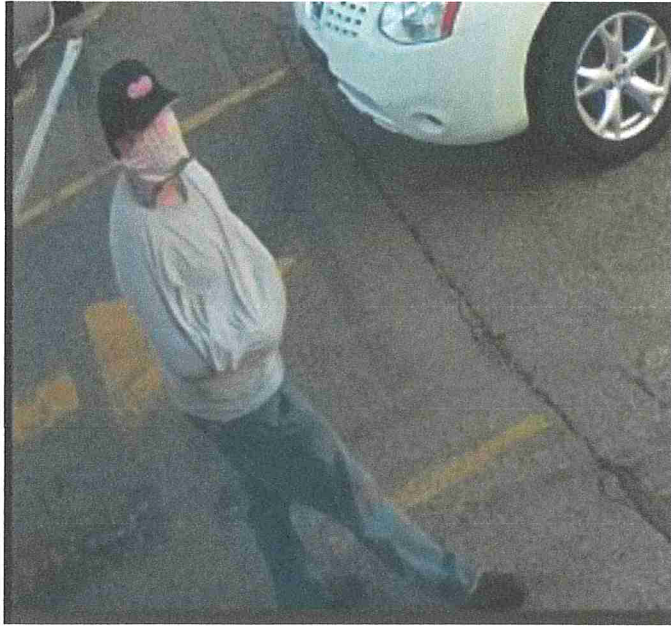
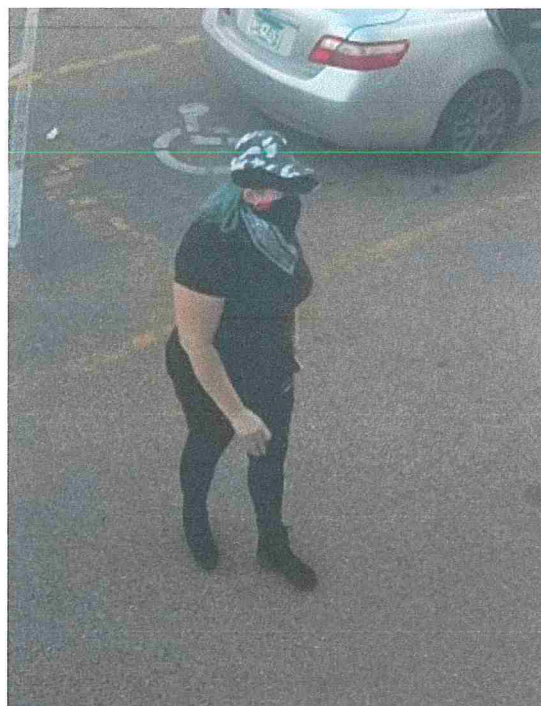


Figure 1 (Above Left) Screen capture of Co-Conspirator 1 generated from surveillance video.

Figure 2 (Above Right) Screen capture of VJW generated from surveillance video.

Figure 3 (Below) Screen capture of Jessica WHITE generated from surveillance video.



14. At approximately 8:45 p.m. Co-Conspirator 1 and VJW exit Enterprise through the front door, along with numerous other unidentified people. Within ten to fifteen seconds, both Co-Conspirator 1 and VJW re-enter the business and proceed to the rear of the building toward the area where the fire originated. No other individuals re-entered the business with Co-Conspirator 1 and VJW. The surveillance video indicates that, at that time (8:45 p.m.), Co-Conspirator 1, VJW, and one other person (Individual A), who had remained inside when all others exited, were the only people inside of the business.

15. Individual A was wearing a black hat, red sandals, and a black athletic suit with white stripes down the side. At approximately 8:46:50 p.m., Individual A exits the business and re-enters approximately 30 seconds later. Individual A walks past the front desk, and out of the view of the camera toward the same area as Co-Conspirator 1 and VJW. Individual A remains inside of the business for approximately one minute before exiting a final time at approximately 8:47:42 p.m.

16. Co-Conspirator 1 and VJW remain inside of the business, mostly in the back area, out of the view of the camera, from the time they re-entered at 8:45 p.m., until approximately 8:49:15 p.m. when both Co-Conspirator 1 and VJW exit the business.

17. At approximately 8:47:13 p.m., while Co-Conspirator 1 and VJW are inside of the business, Jessica WHITE can be seen outside of the business, knocking on the front window and looking into the front door of the business. At approximately 8:47:20 p.m. Co-Conspirator 1 and VJW briefly emerge from the back office area. Co-Conspirator 1 picks up a box from behind the front desk and returns to the rear of the business. VJW walks

into the view of the camera, toward the front door, carrying what appeared to be papers and a cell phone, before abruptly turning around and heading to the back office area again.

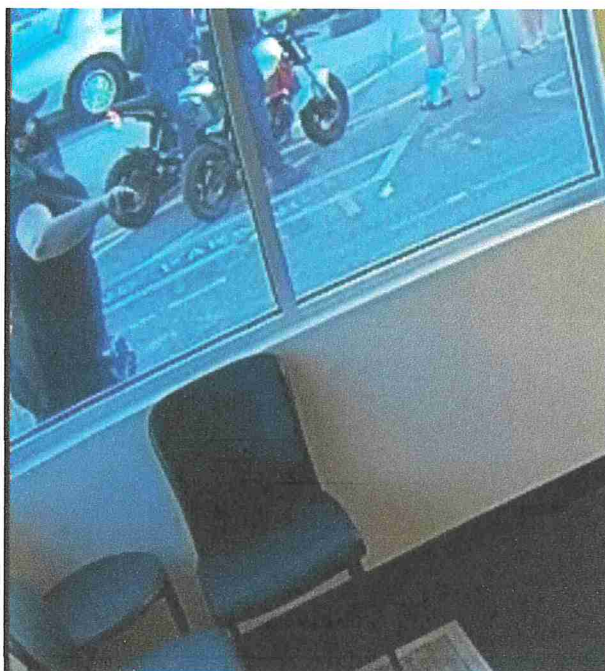
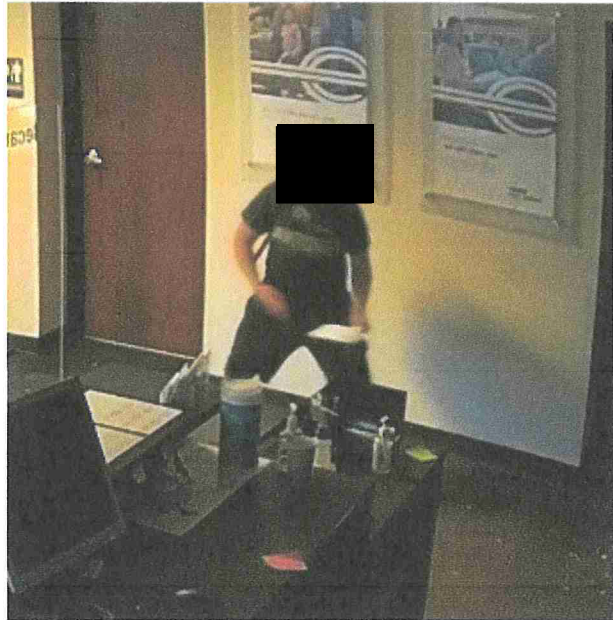
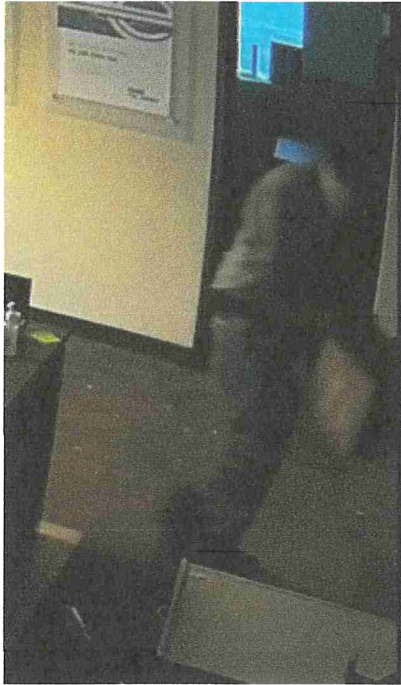


Figure 4 (Above) Screen capture of Jessica WHITE knocking on the window generated from surveillance video.

Figure 5 (Below Left) Screen capture of Co-Conspirator 1 grabbing a box from behind the front desk generated from surveillance video.

Figure 6 (Below Right) Screen capture of VJW holding papers and a phone generated from surveillance video.



18. At approximately 8:48:56 p.m. fire can be seeing flickering in the reflection of the front window. No fire is visible inside of the business on the interior camera view.

19. Approximately three seconds later, at 8:48:59 p.m., Co-Conspirator 1 and VJW emerge from the back of the business and enter the view of the camera. Co-Conspirator 1 and VJW appear to grab a garbage can from the room directly across from the front desk and carry the garbage can back toward the area where the fire originated.

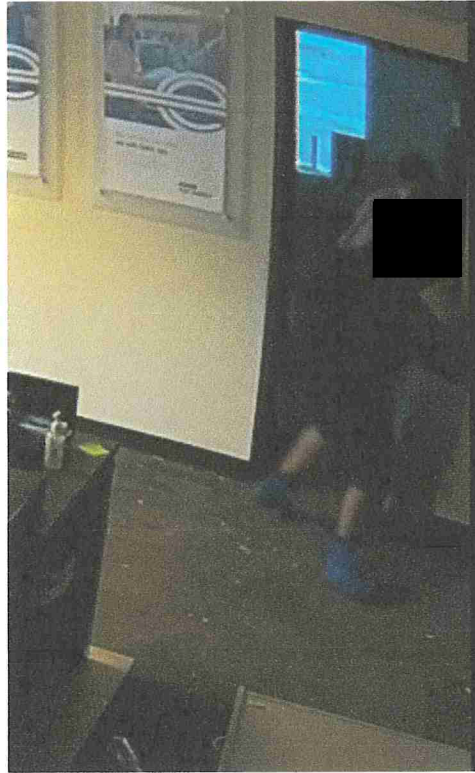


Figure 7 (Above) Screen capture of Co-Conspirator 1 and VJW carrying a trash can toward the area where the fire originated generated from surveillance video.

20. VJW exits the business approximately ten seconds later at 8:49:10 p.m., followed by Co-Conspirator 1 at approximately 8:49:15 p.m.

21. At approximately 8:49:36 p.m., a crowd begins to gather outside of the business. Co-Conspirator 1, VJW, Jessica WHITE, and Individual A subsequently join the crowd in watching the fire. VJW, Jessica WHITE, and Individual A appear to be using cell phones to capture photographs and/or video of the fire.

22. By approximately 8:49:47 p.m., the reflection of the fire in the window is clear and constant and the front lobby area is beginning to fill with smoke.

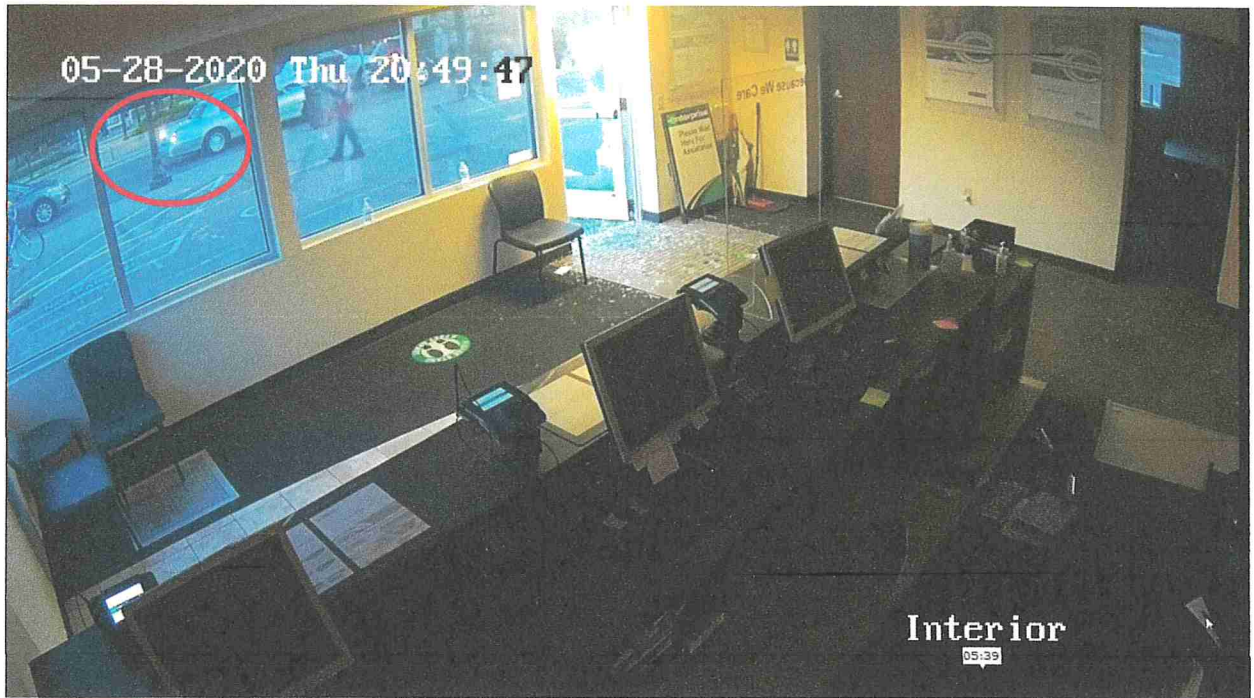


Figure 8 (Above) Screen capture of the fire visible in the reflection of the window and smoke beginning to fill the lobby generated from surveillance video.

23. Witness NL described speaking with Co-Conspirator 1 VJW, and Jessica WHITE, prior to Co-Conspirator 1 and VJW entering the Enterprise building. Witness NL said that the male with the gray t-shirt and white facemask, identified as Co-Conspirator 1, started the fire. The witness did not see Co-Conspirator 1 with any liquids or lighters, but observed Co-Conspirator 1 throwing things on the fire after it was started. Witness NL described the area where the fire had started as being beyond the front desk, on the other side of a small cut out window in the wall. Another witness, DT, described watching Co-Conspirator 1 come from the area where the fire was burning and exit the business. As Co-Conspirator 1 exited, DT heard Co-Conspirator 1 say something similar to, “back up because it’s going up,” which DT interpreted to mean that the building was going to burn.

The witnesses said that VJW looked like he was twelve (years old). Witness NL provided law enforcement with a video he/she had taken as he/she was driving away from the business. That video depicts the fire in the area NL described - the area behind the lobby and front desk.

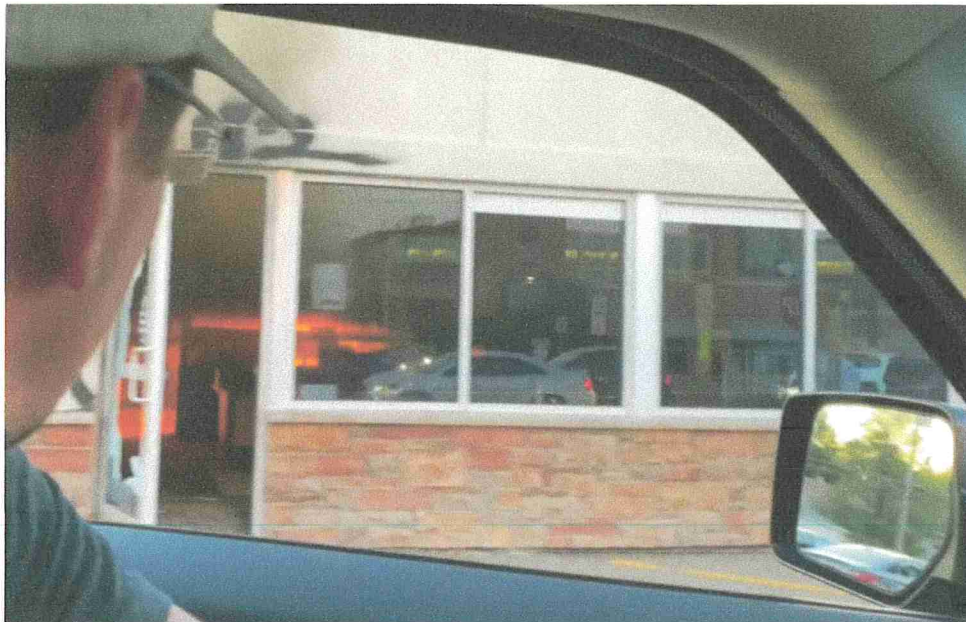


Figure 9 (Above) Screen capture of the fire behind the front desk/lobby area of the business generated from a witness video.

24. Enterprise Rent-A-Car is a business that is used in and affects interstate and foreign commerce. According to its website, Enterprise Rent-A-Car is a subsidiary of Enterprise Holdings, headquartered out of St. Louis, Missouri. Enterprise Holdings, through its independent regional subsidiaries and franchise partners, operates Enterprise Rent-A-Car, National Car Rental and Alamo Rent-A-Car brands via more than 10,000 fully staffed neighborhood and airport offices in 100 countries and territories. The Enterprise

Rent-A-Car located at 1161 University Avenue West in St. Paul, MN, is one of those neighborhood offices. Enterprise Holding's network, which includes Enterprise Rent-A-Car, operates a fleet of more than two million vehicles around the world and has annual revenues of \$25.9 billion, making it the largest car rental service provider in the world as measured by both fleet and revenue. Per the local manager, every car rented out by Enterprise Rent-A-Car is owned and titled by Enterprise Holdings (St. Louis, MO). The local manager also advised that each contract handled by the Enterprise Rent A Car at 1161 University Ave. in St. Paul, MN, is open ended and allows the renter to travel anywhere in the United States and/or Canada. Renters also have the option to rent vehicles for one-way travel, which permits for a vehicle to be rented in one state and returned in another.

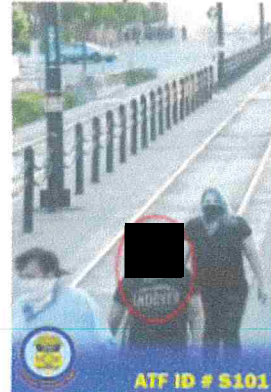
IDENTIFICATION

25. On June 15, 2020, ATF issued a press release showing surveillance photographs from the Enterprise that featured Co-Conspirator 1, VJW and Jessica WHITE, as well as other images of the same individuals. ATF asked for assistance from the public in identifying the three individuals. In this press release, ATF offered a \$5,000 reward for information regarding the Enterprise arsonists.

STP Enterprise



STP Enterprise



STP Enterprise



Figure 10 (ABOVE) Photographs of Co-Conspirator 1 (ATF ID #S102), VJW (ATF ID #S101) and Jessica WHITE (ATF ID #S100) that were released to the media on June 15, 2020.

26. On that same date, June 15, 2020, ATF received several tips, including tips from individuals who wish to remain anonymous, identifying Jessica WHITE as ATF ID #S100 and WHITE'S son, VJW, as ATF ID #S101. One tip specifically indicated that Jessica WHITE was a 33-34 year old female who lived at [REDACTED] Andover, MN (the Subject Residence), and worked for Anytime Bail Bonds in Anoka, MN. The tip further stated that Jessica WHITE has had blue hair for several years. In addition, the tip identified ATF ID#S101 as VJW, Jessica WHITE'S 13-15 year old son. The tipster advised that he/she knew the WHITES from participating in the same youth sports leagues and further advised that the shirt VJW was wearing in the suspect photographs was a t-shirt issued by Andover football, one of the youth sports leagues both the tipster and the WHITE'S participated in. Photographs of Jessica WHITE, show that she has a similar build and features as the surveillance photos of the Enterprise arsonist.

27. On the evening of June 15, 2020, Your Affiant spoke with local law enforcement who had previous contacts with Jessica WHITE and VJW. Your Affiant learned that the most recent contact with the WHITES was on April 10, 2020, when Jessica WHITE had reported that her son, VJW, had run away. The address associated with this call for service was the Subject Residence, the same address provided by the tipster.

PROBABLE CAUSE

28. During the course of this investigation, Your Affiant utilized several informational databases to collect information on Jessica WHITE and VJW. This search revealed that, in addition to the information provided by the tipster and the most recently documented contact with law enforcement, the Subject Residence was also the address

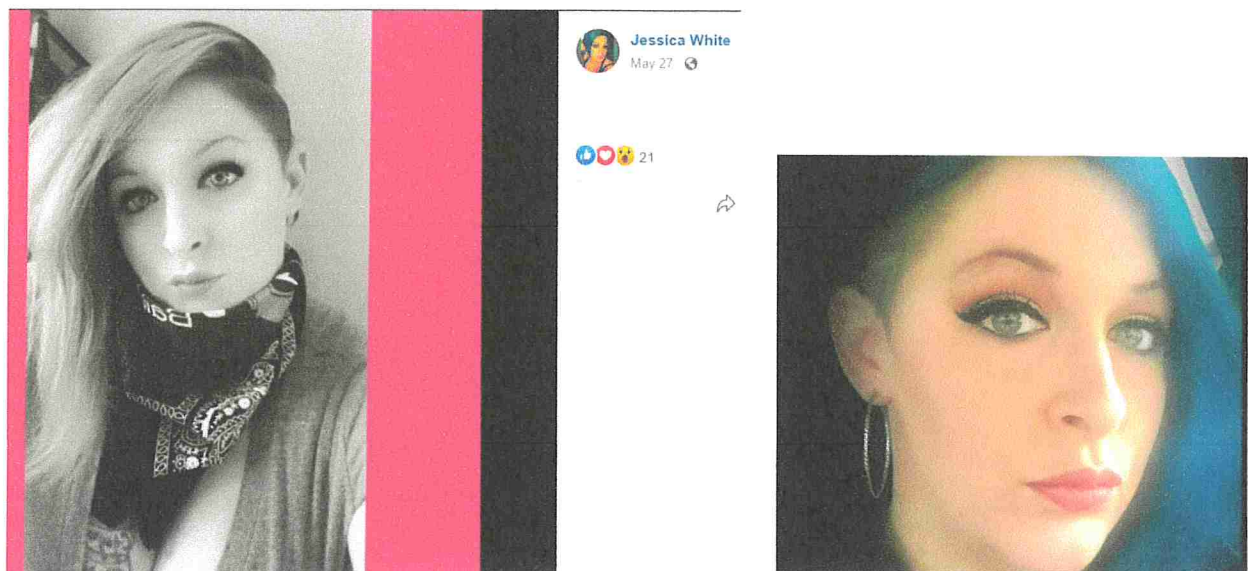


Figure 11 (ABOVE LEFT) Jessica WHITE'S May 27, 2020, Facebook Post, wearing a bandana around her neck.

Figure 12 (Above Right) Jessica WHITE'S April 2020, Facebook post depicting WHITE with blue hair.

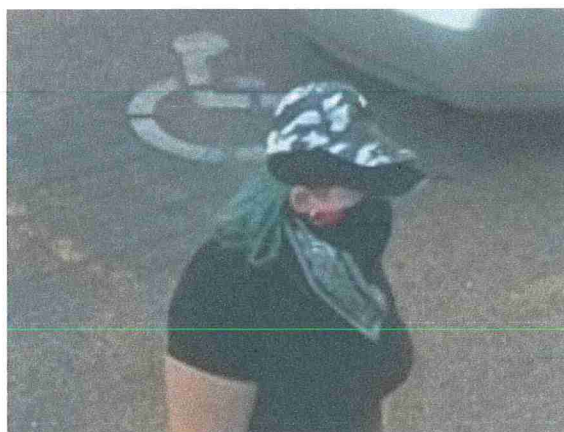
Figure 13 (Below Left) A post depicting Jessica WHITE on the Facebook Page for Anytime Bail Bonds

Figure 14 (Below Center) A post depicting individuals wearing Anytime Bail Bonds masks/bandanas from April 16, 2020, with a caption indicating that the business was practicing safe health measures (from Anytime Bail Bonds Facebook page).

Figure 15 (Below Right) A post from Anytime Bail Bond's Facebook page depicting a winter hat and the bandana/mask available with the Anytime Bail Bond's logo.



Figure 16 (Below) A still photograph of Jessica WHITE generated from the Enterprise Rent A Car surveillance video on May 28, 2020, where part of the red logo and paisley pattern is visible on the bandana.



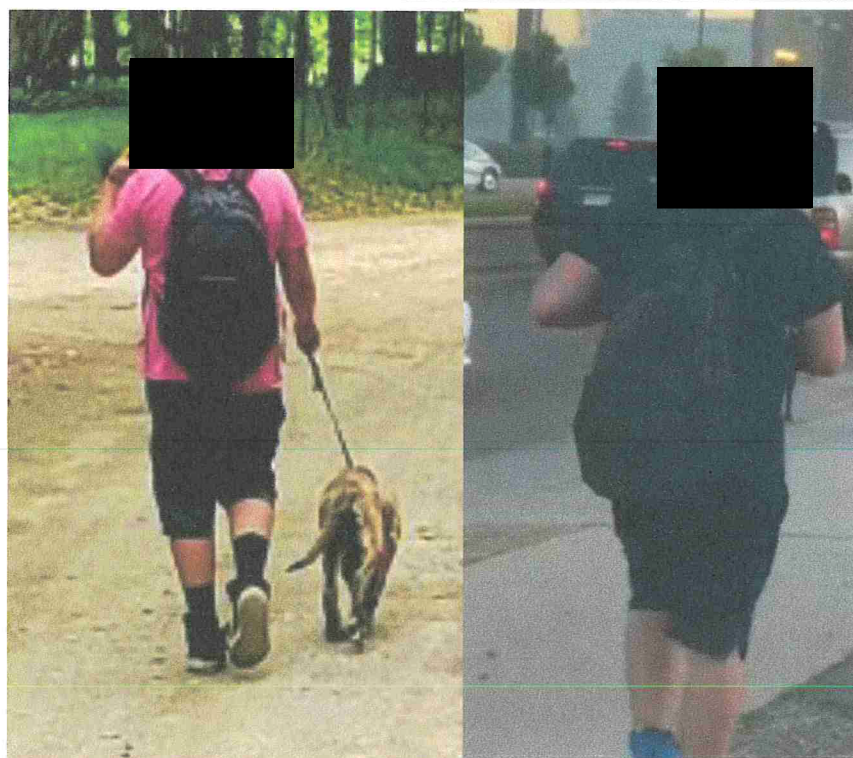
30. On May 21, 2020, a photograph of two younger males walking dogs was posted to Jessica WHITE'S Facebook page. The build and hair style of one of the males appeared to be consistent with the build and hairstyle of the suspect identified as by the tipster as VJW. In addition, the backpack worn by the individual also appeared to be

consistent with the backpack worn by VJW during the arson at the Enterprise Rent-A-Car on May 28, 2020.

31.

Figure 17 (Below Left) A still photograph posted to Jessica WHITE'S Facebook page on May 21, 2020.

Figure 18 (Below Right) A still photograph of VJW generated from the surveillance video from Enterprise Rent A Car on May 28, 2020.

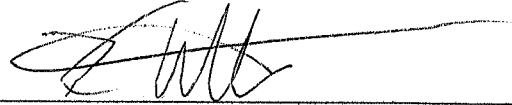


CONCLUSION

32. Based on the above information, I believe there is probable cause to believe that Jessica WHITE, AJW, and Co-Conspirator 1 have conspired with each other to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 371 (Count 1).

Further your affiant sayeth not.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kylie Williamson', written over a horizontal line.

Kylie Williamson, ATF Special Agent

SUBSCRIBED and SWORN before me
by reliable electronic means (FaceTime and
email) pursuant to Fed. R. Crim. P. 41(d)(3) on
June 16, 2020:

A handwritten signature in blue ink, appearing to read 'Kate M. Menendez', written over a horizontal line.

The Honorable Kate M. Menendez,
United States Magistrate Judge