

AO 91 (Rev. 11/11) Criminal Complaint

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JAN 22 2026

MITCHELL R. ELFERS
CLERK

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Julian Alcantar Rodriguez
Year of birth 1990Case No. 26-MJ-219Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1 and January 22, 2026 in the county of Bernalillo in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(2)	Distribution of Child Pornography (January 1, 2026)
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography (January 22, 2026)

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Taylor Pearce, HSI Special Agent

Printed name and title

Sworn to me telephonically and signed electronically.

Date: January 22, 2026City and state: Albuquerque, New Mexico*Judge's signature*

Steven C. Yarbrough, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE ARREST OF:
Julian Alcantar Rodriguez
Year of birth 1990

Case No. _____

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Taylor Pearce, a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), being duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND OF THE AFFIANT

1. I make this affidavit in support of the arrest of Julian Alcantar Rodriguez (year of birth 1990,) (hereafter "ALCANTAR"), for violations of the following criminal statutes: Distribution of Child Pornography; 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography.

2. I am a Special Agent with the Department of Homeland Security – Homeland Security Investigations (HSI) and have been since August 2024. I am currently assigned to the Albuquerque, New Mexico field office. I am recognized as a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure ("FRCP") 41(a)(2)(C). During my tenure with HSI, I have assisted with cases regarding criminal investigations for violations of federal laws including child exploitation. I have gained experience through completing the Criminal Investigator Training Program (CITP), HSI Special Agent Training (HSISAT) at the Federal Law Enforcement Training Center (FLETC) located in Glynco, Georgia. Prior to my tenure with HSI, I was employed by the Georgia Department of Community Supervision (DCS) as a sworn Community Supervision Officer (CSO) for the state of Georgia from February 2020 to August 2024. The job duties were that of a probation and/or parole officer and required the successful completion of the Basic Community Supervision Officer Training (BCSOT) academy

at the Georgia Public Safety Training Center (GPSTC). My job duties included additional responsibilities as a liaison for the accountability courts program, a liaison with the Georgia Commission of Family Violence (GCFV), and the Criminal Justice Coordinating Council (CJCC) Human Trafficking Task Force. In my current position, I have gained experience through everyday work relating to conducting these types of investigations. I have recently attended advanced training dedicated to child exploitation. I received a Bachelor of Arts in Criminology at the University of Northern Iowa in 2019 and a Master of Arts in Intelligence and Security Studies from Augusta University in December 2023.

3. I have received formal and on the job training from other experienced agents and law enforcement officers. My investigative training and experience includes, but is not limited to, conducting surveillance, interviewing subjects, writing affidavits for search and arrest warrants, collecting evidence and learning legal matters which includes the topics of arrests and fourth amendment searches. I have previously participated in child exploitation investigations and search warrants. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2252 and 2252A, and I am authorized by law to request an arrest warrant.

4. The statements contained in this affidavit are based upon my investigation, training and experience, as well as information provided by other law enforcement officers or from other reliable sources. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause to support a criminal complaint against ALCANTAR, for violations of 18 U.S.C. §

2252A(a)(2), Distribution of Child Pornography and 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography.

RELEVANT LEGAL DEFINITIONS

5. The following terms are relevant to this affidavit in support of this application for an arrest warrant:

a. *Child Pornography*: The term “child pornography” is defined at 18 U.S.C. § 2256(8). It consists of any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct), as well as any visual depiction, the production of which involves the use of a minor engaged in sexually explicit conduct. *See* 18 U.S.C. §§ 2252 and 2256(2), (8). The term child sexual abuse material (“CSAM”) is used interchangeably with the term “child pornography.”

b. *CyberTipline Report (“Cybertip”)*: The National Center for Missing and Exploited Children (“NCMEC”) *manages* the CyberTipline, which is a centralized reporting system for the online exploitation of children. Members of the general public, as well as electronic service providers, can report suspected child exploitation through the CyberTipline. NCMEC then reviews the information submitted, works to find a potential location for the incident, and forwards the Cybertip to the appropriate law enforcement agency for possible investigation.

c. *Minor*: The term “minor” means any person under the age of eighteen years.

See 18 U.S.C. § 2256(1).

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

FACTS AND CIRCUMSTANCES ESTABLISHING PROBABLE CAUSE

6. In August 2025, HSI Albuquerque became aware of a large number of CyberTipline Reports sent by NCMEC to the Internet Crimes Against Children (“ICAC”) Task Force, which is overseen by the New Mexico State Department of Justice (“NMDNJ”). HSI Albuquerque learned there were approximately 28 Cybertips, sent from a variety of electronic service providers, that were all related to the same individual residing in the Albuquerque area. The Cybertips span from October 2021, to the most recent Cybertip dated July 8, 2025. The Cybertips include reports of suspected child exploitation activity on platforms including Facebook, Instagram, WhatsApp, and Google. The content of the Cybertips varied, but the user behind each account was connected through various overlapping identifiers, including the same registered phone number. Through investigation, HSI Albuquerque developed ALCANTAR as the individual suspected to be behind these accounts and child exploitation activity.

7. On January 16, 2026, HSI Albuquerque sought and obtained a search warrant for ALCANTAR’s residence on Valley Road in Southwest Albuquerque, Bernalillo County, within the District of New Mexico. The search warrant authorized the seizure and search of electronic devices, as well as the person of ALCANTAR.

8. On January 22, 2026, HSI Albuquerque executed the residential search warrant and encountered ALCANTAR at the residence. HSI Special Agents identified a phone located on ALCANTAR's person, in his front right pants pocket.

9. Pursuant to the terms of the search warrant, HSI Special Agents previewed the contents of ALCANTAR's phone and identified numerous images of child sexual abuse material (CSAM). For instance, I observed an image on the device within ALCANTAR's Google account, depicting a minor engaged in sexually explicit conduct. More specifically, the file name ending in “_(2)(1).jpg” depicts a prepubescent girl who is nude except for sort of green clothing item down by her knees. The child lacks breast development and is small in stature. The child appears to be standing and looking down towards the camera with her bare genitals exposed. The focus of the image is the lascivious display of the child's genitals. I also observed instances of distribution and receipt on the device. For instance, I observed that ALCANTAR sent a video on January 1, 2026, at 1:47 a.m., to another user via text. The video is 34 seconds in length and depicts what appears to be a female infant or young toddler being vaginally penetrated by an adult male penis.

10. HSI Special Agents conducted an interview with ALCANTAR. After being provided his rights pursuant to *Miranda*, which ALCANTAR acknowledged and waived, ALCANTAR admitted to knowingly possessing, sending, and receiving child pornography. More specifically, he admitted to ownership of several of the accounts connected to the Cybertips and he admitted to sharing CSAM with other users. When asked specifically about the video shared on January 1, 2026, described above, ALCANTAR admitted to sending that video via text to someone he met on the Internet. ALCANTAR admitted he was in New Mexico when he sent this video.

11. Finally, HSI Special Agents also located an image within ALCANTAR's Google account that was taken with ALCANTAR's phone, which depicts a close-up image of a

prepubescent female's labia. When asked about this image, ALCANTAR admitted knowledge of the photo and identified the minor depicted as a female previously known to him who was under the age of 10 at the time the photo was taken. ALCANTAR acknowledged that the photo was taken on his device but claimed he did not personally take the photo. This image, along with full identification of the minor female, remains under active investigation.

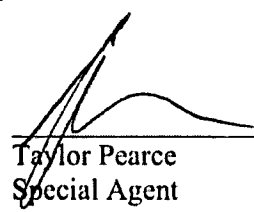
12. The cellular phone used by ALCANTAR to commit these offenses is more fully described as a black Samsung Galaxy S21, bearing serial number R5CRC1KDYCE. Based on my training and experience, Samsung devices are not manufactured within the state of New Mexico and therefore had to travel in interstate and/or foreign commerce before arriving in New Mexico. Therefore, ALCANTAR's use of this device, along with the use of platforms headquartered outside of New Mexico meet the interstate nexus element for the offenses identified in this affidavit.

CONCLUSION

13. In summary, based on the above information, I have probable cause to believe ALCANTAR committed the following violations: 18 U.S.C. § 2252A(a)(2), Distribution of Child Pornography on January 1, 2026, in the District of New Mexico; and 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography on January 22, 2026, in the District of New Mexico.

14. This affidavit has been reviewed by Assistant United States Attorney Sarah Mease.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Taylor Pearce
Special Agent
Homeland Security Investigations

Subscribed electronically and sworn telephonically to me
this 22nd day of January, 2026:



STEVEN C. YARBROUGH
UNITED STATES MAGISTRATE JUDGE
Albuquerque, New Mexico