

LAC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No.: '22 MJ03661

Plaintiff,

COMPLAINT FOR VIOLATION OF

v.

Title 21 U.S.C. § 841 (a)(1)-Possession
of a Controlled Substance with Intent to
Distribute (Felony)

TERESE LEA WHITE,

Defendant.

The undersigned complainant being duly sworn states:

On or about October 4, 2022, within the Southern District of California, defendant, Terese Lea WHITE did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as fentanyl), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent Anthony Lyons
Homeland Security Investigations

Sworn and attested to under oath by telephone, in accordance with Federal Rule of Criminal Procedure 4.1, this 6th day of October 2022.


HON. LUPE RODRIGUEZ, JR.
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

1
2 On October 4, 2022, at approximately 1:25 PM, Teresa Lea WHITE
3 (“WHITE”) submitted to Security Screening at the Transportation Security
4 Administration (“TSA”), Checkpoint 6 at the San Diego International Airport.
5 WHITE, an off-duty Mesa Airlines Flight Attendant, utilized the Known Crew
6 Member (“KCM”) queue to bypass normal security screening procedures. As part
7 of TSA’s Unpredictable Screening Procedures (“USP”), WHITE was selected to
8 pass through normal security screening procedures.

9 While proceeding through normal security procedures, WHITE alarmed the
10 Walk-Through Metal Detector. Subsequently, WHITE was sent through the
11 Advanced Imaging Technology (“AIT”) which generated an alarm on her abdomen
12 area. Transportation Security Officers (“TSO”) noted that WHITE initially appeared
13 hesitant to enter the AIT and then was shaking when she was standing still inside of
14 the AIT.

15 A TSO was unable to resolve the alarm so WHITE was sent to a private
16 screening room for additional screening. During additional screening, WHITE
17 removed a large mass that was wrapped around her abdomen. TSA notified the
18 Harbor Police Department (“HPD”) which responded to the checkpoint with Special
19 Agents (“SAs”) of the Drug Enforcement Agency (“DEA”) Narcotics Task Force,
20 Group 8 (“NTF 8”), and a California Highway Patrol (“CHP”) Canine Team.

1 The CHP Canine Team conducted a sniff on the mass that was removed from
2 WHITE. The Narcotic Detection Dog alerted to the mass.

3 While in custody of HPD Police Officers and NTF 8 SAs, WHITE made
4 spontaneous statements stating that she was flying “non-revenue” to Boston and that
5 the item discovered by TSA was “not what you think.” WHITE stated that one of
6 her co-workers gave her a “mercury pack” to wear for weight loss.

7 A sample of the substance contained within the package field tested positive
8 for the characteristics of fentanyl.

9 A total of 1 package was seized with a total approximate weight of 1.51 kgs
10 (3.33 lbs).

11 WHITE was placed under arrest at approximately 3:10 PM. WHITE was
12 charged with California Health and Safety Code 11350(a) and 11352(a) and was
13 transported to Las Colinas Detention Facility.

14 On October 5, 2022, the California Health and Safety charges were dropped
15 in lieu of Federal Criminal Proceedings. WHITE was transported from Las Colinas
16 Detention Facility to the Western Region Detention Facility. WHITE was charged
17 with a violation of Title 21, United States Code, 841(a)(1), Possession of a
18 Controlled Substance with Intent to Distribute.