

II.

MOTION TO PROCEED UNDER PSEUDONYMS

2. Plaintiffs are parents and their minor children who are victims of the acts described herein; due to extreme privacy concerns and the highly sensitive and personal nature of this matter, Plaintiffs are identified by pseudonyms to protect their identities, consistent with the intent of Texas Rule of Civil Procedure 21(c). Plaintiffs' identities will be made known to Defendants through their counsel of record as counsel appears.

3. Plaintiffs further request that during discovery, the parties (a) use a confidentiality designation for documents that could reveal Plaintiffs' identities; (b) redact personally identifying information from public filings; and (c) refer to the minor-Plaintiffs as "Johnny Doe I" and Johnny Doe II" and their parents as specified in the case caption, to non-party witnesses by initials in depositions and public transcripts, and that at trial the Court implement measures to protect the minor-Plaintiffs, other minor-victims and their parents identities in open court, including limiting public disclosure of identifying details.

III.

PARTIES AND SERVICE

4. Plaintiff **Jane Doe I** (last three digits of her social security number: 097) is an individual residing in Collin County, Texas. Plaintiff **Jane Doe I** proceeds as next friend of **Johnny Doe I**, her minor child.

5. Plaintiff **John Doe I** (last three digits of his social security number: 276) is an individual residing in Collin County, Texas. Plaintiff **John Doe I** proceeds as next friend of **Johnny Doe I**, his minor child.

6. Plaintiff **Jane Doe II** (last three digits of her social security number: 100) is an individual residing in Collin County, Texas. Plaintiff **Jane Doe II** proceeds as next friend of **Johnny Doe II**, her minor child.

7. Defendant **Celina Independent School District (“Celina ISD” or “the District”)** is an independent school district situated in Collin County, Texas. Defendant Celina ISD may be served with process by serving Dr. Thomas Albert Maglisceau, its Superintendent, at 205 S. Colorado Street, Celina, Collin County, Texas 75009, the administrative offices of the ISD. *Issuance of a citation is requested at this time.*

8. Defendant, **William C. “Caleb” Elliott (“Caleb Elliott”)** was at all times relevant hereto, employed by Celina ISD as a teacher and football coach at Celina High School and Moore Middle School. He is a resident of Collin County, Texas, and may be served with process at his primary residence, served at 3913 Milo Drive, McKinney, Texas 75071, or wherever he may be found. *Issuance of a citation is requested at this time.*

9. References herein to acts or omissions of Celina ISD include conduct of its governing body, directors, officers, agents, servants, employees, representatives, and/or independent contractors acting within the course and scope of employment, with authorization and/or ratification by Celina ISD.

IV.

JURISDICTION AND VENUE

10. This Court has subject-matter jurisdiction because Plaintiffs seek damages in excess of the minimum jurisdictional limits of the District Courts of Collin County, Texas.

11. The Court has personal jurisdiction over Defendants because the tortious events and omissions alleged herein occurred in Collin County, Texas.

12. Venue is mandatory in Collin County because this suit involves invasion of privacy, and Defendant Caleb Elliot resided in Collin County at the time of filing suit. *See* TEX. CIV. PRAC. & REM. CODE § 15.017.

13. Alternatively, venue is proper in Collin County because all or a substantial part of the events or omission giving rise to Plaintiffs' claims occurred in Collin County, Texas. *See* TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1).

14. Because this action is not brought under the Texas Tort Claims Act, Chapter 101 of the Texas Civil Practice and Remedies Code, its mandatory venue provisions do not apply.

V.

RULE 47 STATEMENT

15. Under Texas Rule of Civil Procedure 47, Plaintiffs seek monetary relief over \$1,000,000.00; the amount to be awarded will be determined by the jury.

VI.

FACTUAL BACKGROUND

16. Defendant Caleb Elliott is the son of Head Football Coach for Celina High School, Bill Elliott.

17. During the 2022–23 school year, Caleb Elliott worked at Celina High School as a substitute teacher and coach.

18. While employed at the high school, Elliott engaged in an illegal sexual relationship with a vulnerable teenage student, constituting a crime under Texas Penal Code § 21.12 *et seq.*

19. Upon information and belief, when Celina ISD officials discovered Caleb Elliott's criminal sexual misconduct, the District did not terminate his employment.

20. Upon information and belief, the District did not report Caleb Elliott to law enforcement for investigation of the illegal relationship with a teenage student.

21. Upon information and belief, the District did not report Caleb Elliott to the State Board for Educator Certification for immediate investigation and potential certificate revocation.

22. Instead, in the summer of 2023, Celina ISD transferred Caleb Elliott to Moore Middle School, placing him in a position of authority over sixth-grade students as a Social Studies teacher and over eighth-grade boys as a football coach.

23. Upon information and belief, at least one Celina ISD employee reported inappropriate behavior by Caleb Elliott toward children, was told the report was not true, and subsequently left the District.

24. Plaintiffs rely on Defendant Elliot's mental conditions as part of these claims. See, Texas Rules of Evidence 509(e) 4 and 510(d)5.

25. Johnny Doe I, Johnny Doe II were students at Moore Middle School during the 2024-25 and the 2025-26 school years.

26. The minor-Plaintiffs participated in the Moore Middle School football and sports program where Elliott coached them.

27. The Plaintiff-parents trusted Defendant Celina ISD to provide a safe, nurturing environment, *in loco parentis* and to staff teachers and coaches who were good role models and mentors.

28. Caleb Elliott held positions of trust, authority, and supervision over the minor -Plaintiffs and other boys.

29. As a teacher and coach, Caleb Elliott had unsupervised access to boys, including the minor-Plaintiffs during school, athletics, practices, and in the locker room where student athletes

showered and changed.

30. Upon information and belief, at some point during the 2024-25 school year, Caleb Elliott placed hidden cameras in the boys' locker room at Moore Middle School.

31. Upon information and belief, the District did not terminate Elliott, did not contact Police and did not conduct a thorough investigation.

32. Instead, Celina ISD instructed Elliott he was banned from entering the boys' locker room when students were present.

33. Upon information and belief, Celina ISD sent carefully worded "apology letters" to select parents.

34. Upon information and belief, Celina ISD took no meaningful steps to ensure Elliott complied with the locker room ban.

35. At the start of the 2025-26 school year, Elliott returned to Moore Middle School teaching 6th-grade Social Studies and coaching 8th-grade football with continued access to boys.

36. Student-players noticed Elliott avoided the locker room when head coaches Troy Davis and Chase Martin were present.

37. But, when those coaches were absent, Elliott entered the locker room while boys showered and changed, positioning himself to watch them while nude or changing.

38. Students suspected Elliott was photographing and videotaping them with his smartphone.

39. Johnny Doe I and others observed Elliott holding his phone in the locker room on multiple occasions while they showered, undressed, and changed.

40. On or about September and October 2025, Defendant Caleb Elliott committed the offense of Invasive Visual Recording in violation of Texas Penal Code § 21.15 and in violation of 18 U.S.C §§2251(a) and (e) Sexual Exploitation of Children a/k/a Production of Child Pornography

by taking nude photographs of Johnny Doe I and Johnny Doe II other boys in the locker room. Elliot also instructed Johnny Doe I to do jumping jacks and burpees while nude in the boy's shower area.

41. Johnny Doe II and other boys were instructed by Caleb Elliot to do "burpees" while nude in the boys shower area.

42. On or about September and October 2025, Defendant Caleb Elliott committed the criminal offense of Sexual Performance of a Child, a Second Degree Felony in violation of Penal Code §43.26 by instructed Johnny Doe I, Johnny Doe II and other boys to perform naked acts, (burpees and jumping jacks) with such action being the lewd exhibition of Johnny Doe I and Johnny Doe II's genitals in the boys' locker room at Moore Middle School.

43. Elliott's conduct was reported to law enforcement. Celina Police obtained and executed a search warrant for Elliott's cell phone at Moore Middle School.

44. On October 3, 2025, Elliott was arrested and charged with Invasive Visual Recording, a state jail felony under Texas Penal Code § 21.15—an offense recognized as sexual misconduct that waives immunity for public schools under Tex. Civ. Prac. & Rem. Code § 118.001[See Exhibit "A" attached, Arrest Warrant No. 429-10032025-40].

45. Forensic analysis revealed systematic recording of boys in the locker room, creating child sexual abuse material.

46. On October 9, 2025, Elliott was arrested again and charged with Possession or Promotion of Child Pornography, a Second Degree felony under Texas Penal Code § 43.26(d)(B)- an offense recognized as sexual misconduct that waives immunity for public schools under Tex. Civ. Prac. & Rem. Code § 118.001[See Exhibit "B" attached, Arrest Warrant No. 429-10082025-45].

47. On October 15, 2025, Superintendent Maglisceau and the Celina ISD Board of Trustees permitted Elliott to resign in lieu of termination in exchange for surrendering his teaching certificate.

48. On November 7, 2025, Elliot was arrested on a charge of Sexual Performance by a Child a felony under Texas Penal Code § 43.26(c) for requiring the minor victim to perform approximately 30 jumping jacks nude in the boys' locker room at Moore Middle School- an offense recognized as sexual misconduct that waives immunity for public schools under Tex. Civ. Prac. & Rem. Code § 118.001[See Exhibit "C" attached, Arrest Warrant No. 429-1162025-39].

49. On November 12, 2025, Elliot was indicted by a federal grand jury on eight charges of sexual exploitation of children in violation of 18 U.S.C §§2251(a) and (e) Sexual Exploitation of Children a/k/a Production of Child Pornography- an offense recognized as sexual misconduct that waives immunity for public schools under Tex. Civ. Prac. & Rem. Code § 118.001[See Exhibit "D", Indictment in *United States vs. William Caleb Elliot*, No. 4:25CR-226, in The United States District Court for the Eastern District of Texas -Sherman Division.].

50. The minor Plaintiffs have suffered emotional distress and psychological harm, likely to continue in the future.

VII.

CAUSES OF ACTION

A. GROSS NEGLIGENCE (Against Defendant Celina Independent School District)

51. Plaintiffs re-allege and incorporate the foregoing paragraphs.

52. Plaintiffs proceed against Celina ISD pursuant to Chapter 118 of the Texas Civil Practice and Remedies Code, which waives governmental and official immunity of public schools and professional school employees for certain conduct.

53. Celina ISD was grossly negligent, reckless, or engaged in intentional misconduct in hiring, supervising, or employing professional school employee William Caleb Elliott, rendering it liable for an act or omission committed by the employee against enrolled students that is sexual misconduct. Tex. Civ. Prac. & Rem. Code § 118.002(a).

54. Celina ISD was grossly negligent in: (a) continuing to employ Elliott after discovery of an improper relationship with a teen student; (b) transferring him to the middle school; (c) failing to terminate after discovery of hidden cameras; (d) failing to supervise interactions with boys; (e) failing to train on child protection policies and continuing education; (f) allowing Elliott's access to the locker room; and (g) failing to report and/or act on Elliott's misconduct.

55. Viewed objectively, Elliott's continued employment around minor children, especially young boys involved an extreme degree of risk; and Celina ISD, with actual awareness of that risk from prior misconduct, acted with conscious indifference to the minors' rights and safety.

56. These acts and omissions, singly or collectively, constituted gross negligence proximately causing the sexual misconduct and Plaintiffs' injuries; had Celina ISD taken preventative measures, including criminal complaint or termination, the minor-Plaintiffs would not have been subjected to the misconduct.

57. Plaintiffs have named the professional school employee who committed the acts or omissions—William Caleb Elliott—as a Defendant, in compliance with Tex. Civ. Prac. & Rem. Code § 118.002(b).

58. Celina ISD is a “public school” within Chapter 118.

59. Elliott was a “professional school employee” as a teacher and coach employed by Celina ISD.

60. The acts or omissions were committed by Elliott against enrolled students and constituted “sexual conduct” as defined in Tex. Civ. Prac. & Rem. Code § 118.001(4), including violations of Texas Penal Code §§ 21.02(c)(6), 21.11(a)(2)(B), 21.15, 21.17, 21.18, 21.19, 43.25 and 18 U.S.C §§2251(a) and (e) Sexual Exploitation of Children a/k/a Production of Child Pornography.

B. INTRUSION UPON SECLUSION (Against William Caleb Elliott)

61. Elliott intentionally intruded on the private affairs and seclusion of the minor-Plaintiffs by secretly imaging them with his phone and by placing or using cameras in boys’ locker room and shower areas without consent while the children were nude or changing; he also deliberately watched the boys while nude or bathing and/or forced them to perform exercises while nude.

62. Elliott’s actions constituted sexual abuse under Texas Penal Code §§ 21.02(c)(6), 21.11(a)(2)(B), 21.15, 21.17, 21.18, 21.19, 43.25 and 18 U.S.C §§2251(a) and (e) Sexual Exploitation of Children a/k/a Production of Child Pornography.

63. These intrusions occurred where the minor-Plaintiffs had a reasonable expectation of privacy and would be highly offensive to a reasonable person; Elliott abused his authority as coach and teacher for his own perverse voyeuristic purposes.

64. Elliott’s intrusions proximately caused the minor-Plaintiffs’ damages, including severe emotional distress, mental anguish, and loss of privacy.

C. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (Against William Caleb Elliott)

65. Elliott intentionally and secretly recorded nude and partially clothed boys in the Moore Middle School locker room and showers and also forced them to perform exercises while nude.

66. Elliott’s conduct constituted sexual abuse under Texas Penal Code §§ 21.02(c)(6),

21.11(a)(2)(B), 21.15, 21.17, 21.18, 21.19, 43.25 and 18 U.S.C §§2251(a) and (e) Sexual Exploitation of Children a/k/a Production of Child Pornography.

67. Elliott's conduct was extreme and outrageous, beyond all bounds of decency as recognized by the Texas Penal Code.

68. Elliott's conduct proximately caused severe emotional distress to the minor-Plaintiffs.

D. UNLAWFUL DISCLOSURE OF INTIMATE VISUAL MATERIAL UNDER TCPRC CHAPTER 98B (Against William Caleb Elliott)

69. Elliott created intimate visual material depicting the minors' intimate areas in a school locker room and showers where they had a reasonable expectation of privacy and without their effective consent.

70. On information and belief, Elliott disclosed such material by transferring, sharing, syncing, backing up, or otherwise disseminating it without consent and with intent to harm or knowledge that disclosure would cause harm, knowing it was obtained in circumstances where the minors expected not to be recorded.

71. The disclosure directly or indirectly reveals the minor-Plaintiffs' identities.

72. The disclosure caused harm, including severe emotional distress, humiliation, loss of dignity, and disruption of schooling and activities.

**VIII.
ATTORNEY'S FEES & COSTS**

73. Plaintiffs are entitled to court costs and reasonable and necessary attorney's fees under Tex. Civ. Prac. & Rem. Code § 118.004.

**IX.
CONDITIONS PRECEDENT**

74. All conditions precedent to Plaintiffs' claims for relief have been performed or have

occurred.

X.
DAMAGES

75. As a direct and proximate cause of Defendants' negligent acts and/or omissions, the minor-plaintiff, **Johnny Doe-I** suffered damages and injuries that include, but are not limited to:

- a. Physical pain and suffering in the past;
- b. Physical pain and suffering, in reasonable probability, sustained in the future;
- c. Mental anguish in the past;
- d. Mental anguish, in reasonable probability, sustained in the future;
- e. Physical impairment;
- f. Physical disfigurement;
- g. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the past; and
- h. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the future; and
- i. Loss of earning capacity in the future.

76. As a direct and proximate cause of Defendants' negligent acts and/or omissions, the minor-Plaintiff, **Johnny Doe II** suffered damages and injuries that include, but are not limited to:

- a. Physical pain and suffering in the past;
- b. Physical pain and suffering, in reasonable probability, sustained in the future;
- c. Mental anguish in the past;
- d. Mental anguish, in reasonable probability, sustained in the future;
- e. Physical impairment;
- f. Physical disfigurement;
- g. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the past; and

- h. Loss of the normal enjoyment of the pleasure of life, in reasonable probability, sustained in the future; and
- i. Loss of earning capacity in the future.

77. As a direct and proximate cause of Defendants' negligent acts and/or omissions, **Jane Doe and John Doe I, the parents of Johnny Doe I** have suffered damages and injuries that include, but are not limited to:

- a. Reasonable and necessary medical expenses paid on behalf of their minor child in the past; and
- b. Reasonable and necessary medical expenses paid on behalf of her minor child, in reasonable probability, sustained in the future;
- c. Loss of wages in the past; and
- d. Costs of suit.
- e. All other relief, in law and equity, to which Plaintiffs may be justly entitled.

78. As a direct and proximate cause of Defendants' negligent acts and/or omissions, **Jane Doe II, the mother of Johnny Doe II**, have suffered damages and injuries that include, but are not limited to:

- a. Reasonable and necessary medical expenses paid on behalf of their minor child in the past; and
- b. Reasonable and necessary medical expenses paid on behalf of her minor child, in reasonable probability, sustained in the future;
- c. Loss of wages in the past; and
- d. Costs of suit.
- e. All other relief, in law and equity, to which Plaintiffs may be justly entitled.

79. Plaintiffs' damages clearly exceed the minimum jurisdictional requirements for

this Court. Therefore, Plaintiffs seek compensation by the Court and jury for their damages actual and punitive damages, in an amount to be determined by the jury.

XI.

PRE-JUDGEMENT AND POST JUDGMENT INTEREST

80. Plaintiffs seek interest in accordance with Texas Finance Code § 304.104 et seq., and other applicable law.

XII.

RULE 193.7 NOTICE

81. Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiffs hereby give actual notice to Defendants that any and all documents produced may be used against the Defendant producing the documents at any pretrial proceedings and/or trial of this matter without the necessity of authenticating documents.

XIII.

JURY DEMAND

82. Plaintiffs demand a trial by a jury. The jury fee will be submitted with this case filing.

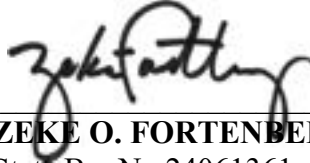
XIV.

PRAYER

FOR THE REASONS STATED ABOVE, Plaintiffs respectfully pray that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for Plaintiff against Defendants jointly and severally for damages in an amount within the jurisdictional limits of the Court for:

- a. Actual damages;
- b. Exemplary damages;
- c. Court costs and legal expenses;
- d. Pre- and post-judgment interest;
- e. Attorney's fees; and
- f. All other relief, legal or equitable, general or special, to which Plaintiffs may be justly entitled.

**RESPECTFULLY SUBMITTED,
FORTENBERRY FIRM PLLC**



ZEKE O. FORTENBERRY

State Bar No.24061361

Tahira Khan Merritt

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zeke@fortenberryfirm.com

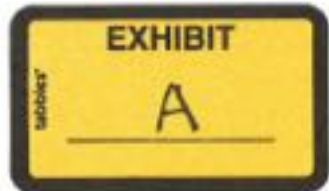
tahira@fortenberryfirm.com

keagan@fortenberryfirm.com

COUNSEL FOR PLAINTIFFS

ARREST WARRANT

CHARGE: INVASIVE VISUAL RECORDING BATH/DRESS RM PC 25.01(c)
 NAME: WILLIAM CALEB ELLIOTT, DOB 06/28/1999
 IDENTIFIERS: W/M 6'00" 185lbs BRO/BLK TX DL: 39625839
 ADDRESS: 3913 MILO DR, MCKINNEY, TX, 75071



THE STATE OF TEXAS)

WARRANT NO. 429-10032025-40

COUNTY OF COLLIN)

TO ANY PEACE OFFICER OF THE STATE OF TEXAS, GREETINGS

The undersigned Magistrate having heretofore found that probable cause exists for the issuance of this Warrant YOU ARE HEREBY COMMANDED TO ARREST WILLIAM CALEB ELLIOT hereinafter referred to as the "Suspect," and bring the said suspect before a Magistrate in and for Collin, County, Texas, instantler, then and there to answer the State of Texas for an offense against the laws of said State, to-wit: **INVASIVE VISUAL RECORDING BATH/DRESS RM, PC 21.15 (e)**, a **STATE JAIL FELONY**, of which offense the said suspect is accused by the written affidavit, under oath of Frank Alegre, a Detective with the Celina, Texas, Police Department, filed before me anterior to the issuance of this Warrant.

Said WILLIAM CALEB ELLIOT is hereby committed to the appropriate jail for custody.

HEREIN FAIL NOT, and due return make hereof to me at the place hereinafter named.

Witness my signature, this the 3rd day of October, 2025

Filed: October 20, 2025 2:02 PM
 Michael Gould
 District Clerk
 Collin County, Texas
 By: Denny, Stacy Deputy

Dan K. Wilson
 Magistrate in and for Collin County, Texas

BOND SET AT: TBD

Came to hand on this the 4 day of Oct, 2025, and executed on the 4 day of Oct, 2025.

BY: Jim Skinner
 Name of peace officer

Collin County Sheriff's Office
 Description of office

J. Allen

429-10032025-40
ARREST WARRANT
ARREST WARRANT AFFIDAVIT

THE STATE OF TEXAS)

COUNTY OF COLLIN)

BEFORE ME, the undersigned authority on this day personally appeared Frank Alegre ("Affiant"), a Detective with the Celina, Texas, Police Department, who after being duly sworn on oath deposes and says that AFFIANT HAS GOOD REASON TO BELIEVE AND DOES BELIEVE THAT:

On or about **OCTOBER 2nd, 2025**, in the City of Celina, Collin County, Texas, **WILLIAM CALEB ELLIOT, W/M DOB 06/28/1999**, hereafter styled the Defendant, did then and there commit the offense of **INVASIVE VISUAL RECORDING BATH/DRESS RM, PC 21.15 (c), a STATE JAIL FELONY**, in that the Defendant did then and there, with intent to invade the privacy of _____ hereafter styled Victim 1, and _____ hereafter styled Victim 2, both minors, and without their consent, recorded by electronic means a visual image of the Victims in a school changing room.

MY BELIEF AS AFORESAID IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

On or about **OCTOBER 2nd, 2025**, in Celina, Collin County, Texas, the offense of **INVASIVE VISUAL RECORDING BATH/DRESS RM** occurred:

On October 3rd, 2025, at approximately 0824 hours, Celina Police Officers were notified of an incident that occurred on October 2nd, 2025, at Moore Middle School, located at 300 G.A Moore Pkwy, Celina, Collin County, TX. The Reporting Party informed Officers that her son, Victim 1, who is also a minor, had informed her that he had observed a coach, hereafter styled the Defendant, recording him as he undressed while inside the school's locker room.

Shortly after, another Reporting Party notified Celina Police Officers of a similar occurrence involving her son, Victim 2, who is also a minor, and the same Defendant. She stated that her son and Victim 1 witnessed the same incident.

A forensic interview of both Victims was conducted at the Children's Advocacy Center located at 1701 Heritage Dr, McKinney, Collin County, TX.

Victim 1 said that on October 2nd, 2025, he attended basketball practice early in the morning at Moore Middle School. Once practice was done, students were dismissed, and he went to the locker room to shower and change. Victim 1 recalled entering the locker room at approximately 0840 hours, and he noticed the Defendant was already inside. Victim 1 said he noticed the Defendant had a cellphone in his hand at the time, which caught his attention because cellphones were not allowed in the area. Victim 1 said the Defendant was the only coach who would always have his phone while in the locker room, while other coaches carried clipboards. Victim 1 said there were

ARREST WARRANT

other students inside the locker room, and described some as half-dressed, some completely undressed, and some beginning to undress. As the Victim was undressing, he looked over and saw the Defendant still had the cellphone in his hand. Victim 1 distinctly recalled the Defendant was grabbing the cellphone by the bottom, with the camera lenses facing toward his direction.

At this time, Victim 2 made his way to Victim 1's location, fully undressed after having just showered. Victim 1 told Victim 2 that he thought the Defendant was recording them. When both Victims looked over, the Defendant turned around and began walking in the opposite direction, with the cellphone still in his hand. Both Victims stated that when the Defendant turned around, they saw a "large red dot" at the bottom of the Defendant's phone screen and a "red square" at the top, which they identified as an icon that appears when a phone is recording something. Through the screen they could see what was ahead of the Defendant's path.

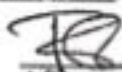
Based on the Affiant's training, experience, and consultations with other investigators specializing in the online and in-person sexual exploitation of children, it is well understood that individuals engaged in the physical and digital exploitation of minors often maintain a digital presence that reflects and perpetuates such conduct.

Given the Defendant's unique position of power and authority over children on a daily basis, Detectives believed it was plausible that the Defendant may have created or maintained digital records of his actions, or those of the children in his care. In light of this, an electronics Search Warrant was obtained (429-10032025-31). During a search of the Defendant's cellphone, Detectives found images of the Victims in the locker room in which they were undressed or about to undress.

The Affiant alleges that the location of Moore Middle School, located at 300 G.A Moore Pkwy, is inside the city limits of Celina, Collin County, Texas, and therefore meets jurisdictional requirements for this Warrant.

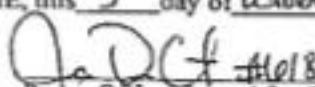
WHEREFORE, I request that an arrest warrant be issued for the Defendant hereinafter designated according to the laws of this State.

Witness my signature, this the 3rd day of October, 2025.

 #630 FRANK ALGEE
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, this 3 day of October, 2025, at
5:45 o'clock P.M.

Filed: October 20, 2025 2:02 PM
Michael Gould
District Clerk
Collin County, Texas
By: Denny Stacy Deputy

 #118
Peace Officer in and for Collin County Texas

ORIGINAL**ARREST WARRANT**

417982

EXHIBIT**B**

CHARGE: POSSESSION OR PROMOTION OF CHILD PORNOGRAPHY TX PC 43.26 (d) (B)
 NAME: WILLIAM CALEB ELLIOTT, DOB 06/28/1999
 IDENTIFIERS: W/M 6'00" 185lbs TX DL: 39625839
 ADDRESS: 3913 MILO DR. MCKINNEY, TX 75071

THE STATE OF TEXAS)

WARRANT NO. 429-10082025-45

COUNTY OF COLLIN)

TO ANY PEACE OFFICER OF THE STATE OF TEXAS, GREETINGS

The undersigned Magistrate having heretofore found that probable cause exists for the issuance of this Warrant YOU ARE HEREBY COMMANDED TO ARREST **William Caleb Elliott** hereinafter referred to as the "Suspect," and bring the said suspect before a Magistrate in and for Collin, County, Texas, instantler, then and there to answer the State of Texas for an offense against the laws of said State, to-wit: **POSSESSION OR PROMOTION OF CHILD PORNOGRAPHY, a Second Degree Felony**, of which offense the said suspect is accused by the written affidavit, under oath of Jerry Crumley, a Detective with the Celina, Texas, Police Department, filed before me anterior to the issuance of this Warrant.

Said **William Caleb Elliott** is hereby committed to the appropriate jail for custody.

HEREIN FAIL NOT, and due return make hereof to me at the place hereinafter named.

Witness my signature, this the 8th day of October, 2025

Dan K. Wilson
 Magistrate in and for Collin County, Texas

BOND SET AT: TBD

Came to hand on this the 9 day of October, 2025, and executed on the 9 day of October, 2025

BY: [Signature]

Name of peace officer

afc
Description of office

Filed: October 16, 2025 4:02 PM
 Michael Gould
 District Clerk
 Collin County, Texas
 By: Denny, Stacy Deputy

COLLIN COUNTY
 25 OCT -9 6-10052

**ARREST WARRANT
ARREST WARRANT AFFIDAVIT**

THE STATE OF TEXAS)

COUNTY OF COLLIN)

BEFORE ME, the undersigned authority on this day personally appeared Jerry Crumley ("Affiant"), a Detective with the Celina, Texas, Police Department, who after being duly sworn on oath deposes and says that AFFIANT HAS GOOD REASON TO BELIEVE AND DOES BELIEVE THAT:

On or about **October 3rd, 2025**, in the City of Celina, Collin County, Texas, **WILLIAM CALEB ELLIOTT W/M DOB 06/28/1999** ("Defendant") did then and there commit the offense of **POSSESSION OR PROMOTION OF CHILD PORNOGRAPHY >10<50 VISUAL DEPICTIONS, TEXAS PENAL CODE 43.26 (d), (B), a Second Degree Felony**, in that the suspect did then and there knowingly or intentionally possess visual material depicting several children under the age of 18 years of age engaged in sexual conduct, who attend a public school within the Celina Independent School District. The visual material of the children was captured while the children were attending school and in areas where an expectation of privacy is expected.

Affiant's belief is based upon the following facts and information which Affiant received from Detective Cameron Coduti, who is employed by the Celina Police Department, as well as his own findings during this on-going investigation. On October 3rd, 2025, at approximately 08:30 AM, Det. Coduti contacted your Affiant and stated a parent of a middle school aged child and the child, were en route to the Celina Police Department to file a report for a sexual in nature criminal offense that took place between a student and a Celina ISD employee. Ultimately, it would be determined that no physical assault had taken place, but rather a mobile device (s) had been utilized to capture several different children under the age of 18 during school hours in a locker room.

Celina Police Department detectives contacted the Children's Advocacy Center of Collin County and arranged for two children to participate in forensic interviews. Ultimately, both children told forensic interviewers they had witnessed the defendant use a mobile device on October 2nd, 2025, during the morning hours, to capture what they believed to be video and/or photographs of them and other student-athletes while in various states of undress or being nude.

Celina Police Department detectives then obtained a search warrant for mobile devices or electronic devices in the possession of the defendant on October 3rd (Warrant #429-10032025-31). Detectives would seize and ultimately search a mobile device (cell phone) using a forensic examination tool and find visual material that meets the legal definition of "sexual conduct" due to lewd exhibition of the genitals, the anus or any portion of the female breast below the top of the areola. The initial search would yield twelve images of visual material that display a child younger than the age of 18 years old.

MY BELIEF AS AFORESAID IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

ARREST WARRANT

On or about October 3rd, 2025, in Celina, Collin County, Texas, the offense of **POSSESSION OR PROMOTION OF CHILD PORNOGRAPHY >10<50 VISUAL DEPICTIONS, TEXAS PENAL CODE 43.26 (d) (B), a Second Degree Felony**, occurred:

Celina Police Department patrol officers took a report for Invasive Visual Recording from a parent of a child younger than the age of 18. The alleged offense occurred while the child was present in the locker room of GA Moore Middle School, located at 300 E GA Moore Parkway, Celina, Collin County, Texas. On initial report, at least two student-athletes witnessed the defendant to have been recording or taking photographs of male children under the age of 18 in the locker room. This occurred the prior morning, October 2nd, 2025.

These two children were transported by parents to the Children's Advocacy Center of Collin County where they participated in a Forensic Interview and provided details of what they had witnessed on October 2nd, 2025, during the morning hours while various male students were showering and/or changing clothing in the locker room. One child told the forensic interviewer the defendant is constantly on his mobile device while in the locker room area and when he is holding his mobile device, he holds it near his waist in a horizontal manner. If another coach enters the locker room or is in the vicinity, the defendant will either place the mobile device in his armpit area or place it in one of his pockets. Out of all coaches, this child thought it was odd as to how long the defendant stayed in the locker room compared to other coaches.

After the forensic interviews were completed, detectives completed a probable cause affidavit for a search warrant for a mobile device (s) or any electronics belonging to or in the possession of the defendant at the time of seizure. Judge Wilson would approve of the probable cause affidavit and search warrant #429-10032025-31 would be issued. Detectives went to GA Moore Middle School and contacted the defendant who provided them with a mobile device (Apple iPhone) and a school issued Apple MacBook that he had in a drawstring style backpack on his person.

Your Affiant is a trained and certified mobile device forensic examiner. Using a forensic tool that he has been trained on and certified on, he discovered multiple images that meet the legal definition of child pornography. Images were discovered as well while not meeting the legal criteria of a criminal offense, most definitely could be considered lewd visual material (child's buttocks are exposed but not the anus, etc.)

The illicit material discovered that does meet the criteria of child pornography is below:

- Image Name: "5005.JPG"
MD5 hash value: 3bb11552f605d86ceec1bf3db258da8b
Capture Time/Creation Date: 10/2/2025 10:55:34 AM
Media Origin: Device Captured
Media Origin Reasoning: Saved Copy, Screenshot App
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There are two pubescent males completely nude in the process of drying off, and one male is in the process of pulling his underwear up. Of these three children, one male child's genitals are visible.

ARREST WARRANT

- Image Name: "uuid=0EC9A248-00A5-4FB0-9FAF-87E872CA4971&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 47bf540cedb2a95d794fc9c37beeb792
Capture Time: 9/16/2025 11:32:56 AM
Creation Date: 9/16/2025 11:41:21 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, facing away from the device used to capture the image. A second pubescent male is seated on an off-white concrete bench with a t-shirt on, but no underwear or lower clothing. His genitals are visible.
- Image Name: "uuid=5FBA6FD6-85FF-43EA-9F15-4CED27F2B2C0&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 774e88fa27fcc1eb1f3c0e0db4d10add
Capture Time: 10/2/2025 10:52:43 AM
Creation Date: 10/2/2025 10:58:55 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, facing away from the device used to capture the image. A second pubescent male is standing up, completely nude and facing towards the device used to capture the image. This child's genitals are exposed.
- Image Name: "uuid=762C4B36-CEf1-40E3-BDBA-3EA71FE50CB0&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 7e584d9d88d0d2df81df7b3711f63573
Capture Time: 10/2/2025 10:55:45 AM
Creation Date: 10/2/2025 10:58:55 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, facing away from the device used to capture the image. A second pubescent male is standing up, completely nude and slightly facing towards the device used to capture the image. This child's genitals are exposed.
- Image Name: "uuid=169BDD56-51D9-4BDC-8FD2-D565CD1548AB&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 131802287984013ae415749829dc91cf
Capture Time: 10/2/2025 10:44:12 AM
Creation Date: 10/2/2025 10:58:55 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room undressed. In this photograph, you can see four male children; one child is slightly turned away from the device that was used to

ARREST WARRANT

capture the image, but his genitals are exposed. Another male is standing to the left of this child, and he is facing the device used to capture the image. His genitals are visible. The other pubescent male children in the photograph while nude, only their buttocks can be seen.

- Image Name: "uuid=BC675E05-8705-49FF-ACB6-B2360535B9BA&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 48fb28283074ed92f8c4b9e92a01a188
Capture Time: 10/2/2025 10:46:39 AM
Creation Date: 10/2/2025 10:58:55 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: A pubescent male is seen standing on an off-white concrete bench ledge/seat in front of a locker, nude from the waist down. His genitals are visible. In the background, another pubescent male can be seen but he is fully clothed in a what appears to be football gear, and the gear is Celina ISD school colors.
- Image Name: "uuid=84111ECF-2F41-428D-AB4B-739F9E30D173&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: bf2f5be6dc06dc44e24fdb21f1272945
Capture Time: 9/16/2025 11:33:19 AM
Creation Date: 9/16/2025 11:41:21 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, standing sideways to the device used to capture the image, but his head is turned towards the device. His genitals are visible. A second male is seated on an off-white concrete style ledge/seat in a t-shirt. His genitals are visible.
- Image Name: "uuid=A1B4C046-D7A8-4AF0-86B9-454CECC16FF5&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 04c9ccc821c396576019f670e742fd6a
Capture Time: 9/16/2025 11:33:10 AM
Creation Date: 9/16/2025 11:41:21 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, standing sideways to the device used to capture the image, but his head is turned slightly towards the device and his leg is lifted, bent at the knee. His genitals are visible. A second male is seated on an off-white concrete style ledge/seat in a t-shirt. His genitals are visible.
- Image Name: "uuid=0F6CDB38-78D6-440C-A70E-50941CEBA263&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 0e0b6ded955a75774ac5fb23d4f263a3
Capture Time: 9/16/2025 11:32:25 AM
Creation Date: 9/16/2025 11:41:21 AM

ARREST WARRANT

Media Origin: Unknown

Media Origin Reasoning: Unknown

Orientation: Horizontal (normal)

Description: Multiple pubescent males in a locker room in various states of dress or undress. There is one pubescent male that is completely nude, standing and facing away from the device used to capture the image. A second male is seated on an off-white concrete style ledge/seat in a t-shirt. His genitals are visible.

- Image Name: "uuid=501076B6-D32F-413A-A5B9-E83D5E0BF193&code=001&library=1&type=1&mode=1&loc=true&cap=true.jpeg"
MD5 hash value: c27432201a59d99897d32d95e8a7c33e
Capture Time: 4/8/2025 10:08:14 AM
Creation Date: 4/8/2025 10:11:16 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: Multiple pubescent males in a locker room in various states of dress or undress. A placard on the wall displays the words, "BOYS SHOWER" with a figure commonly associated with male bathrooms, a person in a wheelchair to signify it is accessible to persons with special mobility needs and what appears to be Braille. One of the pubescent male children is nude, but facing away from the device used to capture the image. Two other pubescent males appear to be nude, but their lower half of their body is covered by a towel. A fourth male, is slightly facing the device used to capture the image, bent over and is drying himself off with a towel. His genitals are visible.
- Image Name: "uuid=CD8F4EED-D33E-405B-89CFDDDD29E634C7F&code=001&library=1&type=1&mode=1&loc=true&cap=true.jpg"
MD5 hash value: 7f6181db54aa14c3efe3c27cbc140d22
Capture Time: 4/8/2025 10:07:56 AM
Creation Date: 4/8/2025 10:11:16 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: A couple of pubescent males in a locker room in various states of dress or undress. There is one pubescent male who is facing the device used to capture the image, using a towel to dry his back off and his genitals are visible. Another pubescent male is pulling his underwear down and bent over but it is difficult to tell if his genitals are visible or not.
- Image Name: "uuid=9C434FC1-552D-4000-B788-8CB4FC8B5CA6&code=001&library=1&type=1&mode=1&loc=true&cap=true.png"
MD5 hash value: 36d11c7c844f7910a7b7c6d5286a9620
Capture Time: 10/2/2025 10:55:34 AM
Creation Date: 10/2/2025 10:58:55 AM
Media Origin: Unknown
Media Origin Reasoning: Unknown
Orientation: Horizontal (normal)
Description: A couple of pubescent males in a locker room in various states of dress or

ARREST WARRANT

undress. One pubescent male child towards the back of the image, drying his back off with a dark colored towel. His genitals are visible.

The Affiant alleges that the Defendant intentionally or knowingly possessed or promoted visual material of children under the age of 18 years old while their genitals were visible.

WHEREFORE, I request that an arrest warrant be issued for the suspect hereinafter designated according to the laws of this State.

Witness my signature, this the 5th day of October 2025

Angela #636
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, this 5th day of October 2025, at
5:20 o'clock P m.

B. Kennedy 610
Peace Officer in and for Collin County Texas
B. Kennedy 610

ORIGINAL

ARREST WARRANT

CHARGE: Sexual Performance by a Child Employ/Induce/Authorize, Texas Penal Code 43.25(c)
NAME: William Caleb Elliott, DOB: 06/28/1999
IDENTIFIERS: W/M 6'00" 185lbs TX DL: [REDACTED]
ADDRESS: 3910 Milio Drive, McKinney, Texas 75071



THE STATE OF TEXAS)

WARRANT NO. 429-11062025-39

COUNTY OF COLLIN)

TO ANY PEACE OFFICER OF THE STATE OF TEXAS, GREETINGS

The undersigned Magistrate having heretofore found that probable cause exists for the issuance of this Warrant **YOU ARE HEREBY COMMANDED TO ARREST WILLIAM CALEB ELLIOTT** hereinafter referred to as the "Defendant," and bring the said defendant before a Magistrate in and for Collin, County, Texas, instantler, then and there to answer the State of Texas for an offense against the laws of said State, to-wit: **Texas Penal Code 43.25(c), Sexual Performance by a Child, a Second Degree Felony**, of which offense the said defendant is accused by the written affidavit, under oath of Jensen DeGroot, a Detective with the Celina, Texas, Police Department, filed before me anterior to the issuance of this Warrant.

Said **WILLIAM CALEB ELLIOTT** is hereby committed to the appropriate jail for custody.

HEREIN FAIL NOT, and due return make hereof to me at the place hereinafter named

Witness my signature, this the 6th day of November, 2025

Dan K Wilson

Magistrate in and for Collin County, Texas

RECEIVED
25 NOV -6 PM 6:31
SHERIFF
COLLIN COUNTY

BOND SET AT: TBD

Came to hand on this the 6th day of November, 2025, and executed on the 7 day of November, 2025.

BY: Fredrick
Name of peace officer

Detection
Description of office

Filed: November 18, 2025 11:45 AM
Michael Gould
District Clerk
Collin County, Texas
By: Denny, Stacy Deputy

ARREST WARRANT
ARREST WARRANT AFFIDAVIT

THE STATE OF TEXAS)

COUNTY OF COLLIN)

BEFORE ME, the undersigned authority on this day personally appeared Jensen DeGroot ("Affiant"), a Detective with the Celina, Texas, Police Department, who after being duly sworn on oath deposes and says that AFFIANT HAS GOOD REASON TO BELIEVE AND DOES BELIEVE THAT:

On or about October 3, 2025, in the City of Celina, Collin County, Texas, **WILLIAM CALEB ELLIOTT (W/M DOB: 06/28/1999)** ("Defendant") did then and there commit the offense of **TEXAS PENAL CODE 42.35(e), SEXUAL PERFORMANCE BY A CHILD, a Second Degree Felony**, when the defendant did then and there induce a child who was younger than 18 years of age, "Victim" who is male, born in the year 2010, and affiant confirmed his age to be 15 years old, to engage in sexual conduct, namely perform over thirty (30) jumping jacks while nude inside the boys' locker room, with the action being a lewd exhibition of the victim's genitals, and the defendant knew the character and content of the sexual conduct or sexual performance.

MY BELIEF AS AFORESAID IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

On or about October 23, 2025 at approximately 1010 hours, in Celina Collin County, Texas 75009, the offense of **TEXAS PENAL CODE 43.25(c), SEXUAL PERFORMANCE BY A CHILD**, was reported to Celina Police Detectives.

On November 6, 2025, I, Detective DeGroot, obtained an email from Moore Middle School Assistant Principal Kendric Smith dated October 23, 2025 at approximately 1010 hours, making law enforcement aware that concerned citizen, ("Witness"), who has been identified, had reported to Kendric that she heard Victim talk about his coach, identified as William Caleb Elliott (W/M DOB: 06/28/1999) ("Defendant"), making him perform jumping jacks while nude.

After receiving the initial email, Celina Detectives contacted the mother of Victim and scheduled a forensic interview for October 27th and then the mother changed it to October 29th. On October 29th, the mother cancelled the forensic interview stating the reason was car trouble and it was rescheduled for November 5, 2025 at 1530 hours.

On November 5, 2025 at approximately 1530 hours, I observed the forensic interview of the Victim at the Children's Advocacy Center of Collin County located at 1701 Heritage Drive in McKinney, Texas 75069. During the interview, the victim and the forensic interviewer entered into a truth/lie pact, which was established verbally. Victim, who is a student on the football team at Moore Middle School, located at 300 E GA Moore Pkwy in Celina Collin County, Texas 75009, described an incident that happened in the locker room between him and his coach, who he identified as Defendant.

ARREST WARRANT

Victim informed the interviewer that one morning, he had had his backpack taken away by Defendant. After morning football practice, Victim was in the boys' locker room at Moore Middle School. Victim was in the process of showering and changing when Defendant approached him near the shower area inside the locker room. Victim stated Defendant told him he needed to perform jumping jacks in order to get his backpack back. Victim, who was nude, began doing the jumping jacks, which such an action could be considered a lewd exhibition of the victim's genitals. Defendant stood there facing Victim, and could see Victim's entire body. Victim stated he did not think Defendant changed his demeanor, nor did he say anything to him. Victim completed approximately thirty (30) jumping jacks while nude, and then Defendant gave him back his backpack. Victim did not question the demand because he is new to the school district and stated he was not sure how things usually worked.

On 11/06/2025, I contacted Witness to confirm what she had heard from Victim. Witness stated she was driving Victim and several other juveniles to the movies on October 17, 2025. She overheard Victim tell the other juveniles that Defendant made Victim perform jumping jacks while nude in the locker room.

It should be noted that on October 3, 2025, Defendant was arrested for Invasive Visual Recording Bathroom/Dressing Room and again on October 9, 2025 for Possession or Promotion of Child Pornography.

WHEREFORE, I request that an arrest warrant be issued for the defendant hereinafter designated according to the laws of this State.

Witness my signature, this the 16 day of November, 2025

J. D. C. #618
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, this 16th day of November, 2025, at 4:40 o'clock p.m.

[Signature]
Peace Officer in and for Collin County Texas
C. BARNARD #618



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED

NOV 12 2025

Clerk, U.S. District Court
Texas Eastern

UNITED STATES OF AMERICA

v.

WILLIAM CALEB ELLIOTT

§
§
§
§
§

No. 4:25CR

Judge

226

Alm / BD

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2251(a) and (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 1, a minor known to the Grand Jury, to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Two

Violation: 18 U.S.C. §§ 2251(a) and (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 2, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Three

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 3, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Four

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 4, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Five

Violation: 18 U.S.C. §§ 2251(a) and (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the

purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 5, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Six

Violation: 18 U.S.C. §§ 2251(a) and (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced

using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 6, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Seven

Violation: 18 U.S.C. §§ 2251(a) and (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of

interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 7, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Count Eight

Violation: 18 U.S.C. §§ 2251(a) & (c)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography;
Attempt)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, and elsewhere, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct, and did attempt to employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; that such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting

interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce a minor known to the Grand Jury, and did attempt to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the Internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) & (c)

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Upon conviction of the offense(s) alleged in this Indictment, the defendant, **William Caleb Elliott**, shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Apple iPhone 17, black, IMEI 350319290192780, IMEI(2): 350319290117423, Serial No. KMVQD3Y2VN

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

1. any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. §§ 2253(a)(1) and (a)(3).

A TRUE BILL

SD.
GRAND JURY FOREPERSON

JAY COMBS
ACTING UNITED STATES ATTORNEY

Calli Bailey
CALLI BAILEY
Assistant United States Attorney

Date: 11/12/2025

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:25CR
	§	Judge
WILLIAM CALEB ELLIOTT	§	

NOTICE OF PENALTY

Counts One through Eight

Violation: 18 U.S.C. §§ 2251(a) and (e)

Penalty: Imprisonment for not less than 15 years and not more than 30 years; if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or sex trafficking of children, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than 25 years and not more than 50 years; if the defendant has two or more convictions under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to the sexual exploitation of children, such person shall be imprisoned for not less than 35 years and not more than life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00

AVAA Assessment: \$ 50,000.00

Automated Certificate of eService

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Paralegal Fortenberry on behalf of Zeke Fortenberry

Bar No. 24061361

paralegal@fortenberryfirm.com

Envelope ID: 108447193

Filing Code Description: Plaintiff's Original Petition (OCA)

Filing Description: Plaintiffs' Original Petition and Jury Demand

Status as of 11/25/2025 2:55 PM CST

Case Contacts

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