

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 12-116</b>
<b>VERSUS</b>	*	<b>SECTION: "C"</b>
<b>JASON LONG</b>	*	
	* * *	

**F A C T U A L B A S I S**

The defendant, **JASON LONG** (hereinafter, the “defendant” or “**LONG**”), has agreed to plead guilty to Count One of the two-count Indictment pending against him, charging him with receipt of child pornography, in violation of Title 18, United States Code, Section 2252(a)(2). Should this matter proceed to trial, both the Government and the defendant, **JASON LONG**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

The Government would show that, at all times mentioned in the Indictment, the defendant, **JASON LONG**, was a resident of the Eastern District of Louisiana who lived in

Norco, Louisiana.

The Government would further present competent testimony and evidence that Special Agents from the Federal Bureau of Investigation determined that **LONG** was downloading and sharing images depicting the sexual exploitation of children (“child pornography”) through the use of various peer-to-peer file sharing software. On October 17, 2011, law enforcement officials executed a search warrant, based on probable cause, at **LONG’S** residence in Norco, Louisiana. Special agents would testify that they recovered two computers that were determined to contain images and videos of child pornography during the execution of the search warrant: one (1) Dell Inspiron M5030 laptop computer and one (1) HP Pavilion s7700n computer.

The Government would further establish through testimony and documentary evidence that **LONG** knowingly used both computers to search for, download, and save images of child pornography. Further, the evidence and testimony would establish that a computer forensic search of **LONG’S** seized computers and related evidence revealed 93 images and 64 videos depicting the sexual victimization of children on **LONG’S** Dell Inspiron M5030 laptop and 139 images and 105 videos depicting the sexual victimization of children on **LONG’S** HP Pavilion s7700n computer.

Further, the Government would establish, through introducing the results of the computer forensic search, that **LONG** used a pirated version of the peer-to-peer file sharing program Limewire to download child pornography. The Government would also establish that **LONG** used a series of search terms to look for child pornography, including “preteen,” “pthc,” “preteen discussion boards,” “preteen thongs,” “preteen pantys,” and “where to buy preteen thongs.” **LONG** downloaded images and videos of child pornography, including, but not limited

to, files entitled “pthc\_kely13young girl - preteen child porn - sex and drugs are cool(1)(1).jpg,” “(PTHC) Sandy\_7Yo - Dad Fucking and Cumming In His Daughthr.avi,” and “Pthc-2011 Spy Girl 5yo.avi.”

Further, the Government would introduce post-*Miranda* statements, wherein **LONG** voluntarily admitted to Special Agents with the FBI that he knowingly received, downloaded, and possessed images of child pornography. According to **LONG**, he used the Dell laptop most recently to download child pornography. **LONG** further stated that he had been actively searching for and downloading child pornography for a long period of time and that he had an addiction to child pornography. **LONG** further provided passwords for the aforementioned computers.

Forensic evidence consisting of medical testimony, law enforcement officers, and supporting documentation would establish that some of the child victims depicted in the images possessed by **LONG** were of real, identifiable victims, less than the age of eighteen (18) years old at the time the child pornography was created.

Testimony would establish that some of the child victims depicted in the materials possessed and received by **LONG** were of prepubescent children less than eighteen (18) years of age; to wit: less than six (6) years old and that the images of the child victims were engaged in “sexually explicit conduct,” as defined in Title 18, United States Code, Section 2256. These images and videos include pictures of adult males vaginally penetrating minor victims and unclothed minor victims being bound and/or restrained and fully exposing his/her genitalia. All of the images depicting the sexual victimization of minors possessed by the defendant would be introduced through the testimony of Special Agents with the FBI.

Further, the Government would present evidence that would establish that the images of child pornography had been transported in interstate commerce via computer.

Further, the Government would show through testimony and documentary evidence that the equipment used by the defendant to acquire the child pornography was transported in interstate or foreign commerce.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, Special Agents and forensic examiners from the FBI, other witnesses, documents and electronic devices in the possession of the FBI, and the voluntary statements of the defendant, **JASON LONG**.

**APPROVED AND ACCEPTED:**

\_\_\_\_\_  
JASON LONG Date  
Defendant

\_\_\_\_\_  
GEORGE CHANEY, JR. Date  
(Louisiana Bar No. \_\_\_\_\_)  
Attorney for Defendant Long

\_\_\_\_\_  
JORDAN GINSBERG Date  
(Illinois Bar. No. 6282956)  
Assistant United States Attorney