


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 18-201
v. * SECTION: "A"
JARED CARRELL *
*
* * *

FACTUAL BASIS

Should this matter proceed to trial, both the Government and the defendant, **JARED CARRELL** ("CARRELL"), do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the Government would prove the following beyond a reasonable doubt at trial.

The case against **CARRELL** began on May 30, 2018, when Louisiana State Police ("LSP") Trooper Joshua Van Etta ("TRP Van Etta") received a complaint from Kandace and **JARED CARRELL**. TRP Van Etta responded to the Carrell's residence located at Winder Rd., Thibodaux, LA. Mrs. Carrell told TRP Van Etta that she utilized her husband's LG cellphone and accessed the "My Downloads" electronic folder on the device in order to retrieve a document. Mrs. Carrell reported that the "My Downloads" contained a folder named "*****_2003-2004" in which she discovered hundreds of images depicting the sexual victimization of children. According to Mrs. Carrell, she exited the "*****" folder and found additional videos depicting the sexual exploitation of children in other locations on the phone. Mr. **CARRELL** claimed he recently purchased the phone on April 25, 2018. **CARRELL** said he believed the images were contained on the cell phone prior to his purchase and alleged the phone was refurbished.

AUSA
Defendant
Defense Counsel 

TRP Van Etta obtained written consent to search the LG cell phone from **CARRELL**. On June 4, 2018, TRP Van Etta obtained a search warrant authorizing a search of the cell phone. A preliminary forensic search by the LSP revealed the presence of hundreds of images of child pornography. As a result of those forensic findings, on July 9, 2018, LSP along with the U.S. Department of Homeland Security, Homeland Security Investigations (“HSI”) executed a search warrant at **CARRELL**’s residence.

During the execution of the warrant, TRP Van Etta and HSI SA Charlotte Green (“SA Green”) advised **CARRELL** of his *Miranda* rights and, after waiving his rights, he confessed to viewing and downloading child pornography using his LG cell phone. **CARRELL** said he began viewing and downloading child pornography within the first week of receiving his LG-H931 cell phone.¹ **CARRELL** admitted to accessing websites such as “Chatango.com” and “NUbeache.com” to view child pornography. **CARRELL** stated that while viewing images and videos of child pornography online, he would access the corresponding hyperlink to the images or videos and download the images or videos, first to his cell phone through Google Drive, then to his “Downloads” folder on his phone. **CARRELL** said that by downloading images and videos to his “Downloads” folder on his phone, he could access the folder when working offshore and internet access was unavailable. **CARRELL** explained he downloaded the “*****_2003-2004” folder onto his cell phone. He said he saw a “little girl” lying on a couch with her vagina area exposed when he unzipped the folder. **CARRELL** also said he downloaded VLC Media Player

¹ Records obtained from AT&T reflect that **CARRELL** purchased the LG cell phone on April 25, 2018.

onto his LG-H931 cell phone because the phone's pre-loaded software would not play all of the videos he was attempting to access.

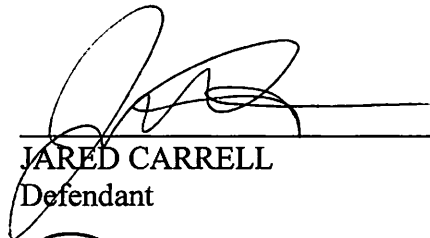
On July 31, 2018, SA Green sought and obtained a federal search warrant for all of **CARRELL's** seized electronic devices and related media. During a subsequent search, HSI computer forensic examiners located 2,722 images depicting the sexual victimization of children on the defendant's LG-H931 cell phone. Specifically, these images depict acts of violence involving children including pre-pubescent girls engaged in sexual acts with adults.

The Government would present evidence to establish that the images of child pornography were distributed in interstate commerce and using computer equipment that had been transported in interstate and foreign commerce. The Government would show through testimonial and documentary evidence that the device used by **CARRELL** to download and possess the child pornography was manufactured outside of the State of Louisiana and was transported in interstate or foreign commerce. Specifically, **CARRELL's** LG-H931 cell phone was manufactured in South Korea.

Various records and testimonial evidence, including testimony from representatives of HSI, LSP, and other witnesses would also be called to prove the facts set forth above.

LIMITED NATURE OF FACTUAL BASIS

This Factual Basis is not intended to constitute a complete statement of all facts known by the Government and the defendant, but rather is a minimum statement of facts intended to prove the necessary factual predicate for defendant's guilty plea. The limited purpose of this Factual Basis is to demonstrate that there exists sufficient legal basis for defendant's plea of guilty to the charged offense.




JARED CARRELL
Defendant

4/30/19
DATE



SAMUEL SCILLITANI
Counsel for Defendant

4/30/19
DATE



BRIAN M. KLEBBA
Assistant United States Attorney

4/30/19
DATE