

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 14-196**

v. * **SECTION: "E"**

GEOFFREY WALKER *

* * *

FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant.

The government would establish that the investigation against **GEOFFREY WALKER** ("**WALKER**") began in January 2013 as a result of an undercover operation by federal law enforcement agents with Homeland Security Investigations ("HSI") into the sexual exploitation of children and the distribution of child pornography in the Eastern District of Louisiana.

The government would establish that between on or about January 24, 2013, and continuing to on or about July 19, 2014, **WALKER** utilized his email account "shadow967hotmail.com" to distribute and receive child pornography.

The government would present evidence that in February 2013, special agents with HSI determined that **WALKER** was responsible for sending images depicting the sexual exploitation of children. On February 27, 2013, HSI agents obtained a federal search warrant to search **WALKER**'s shadow967@hotmail.com email account. A forensic analysis of **WALKER**'s email account revealed that it contained approximately 750 images and over 75 videos of child pornography files. On eleven different occasions, **WALKER** emailed sexually explicit images of minors to an undercover HSI agent located in New Orleans, Louisiana.

On September 5, 2014, HSI agents executed a federal search warrant at **WALKER**'s residence in San Francisco, California. During the search, agents recovered and seized a laptop computer. After being advised of his *Miranda* warnings, **WALKER** admitted to downloading and distributing images depicting the sexual victimization of children. Specifically, **WALKER** said he was sexually attracted to child pornography, specifically boys between the ages of nine to seventeen. **WALKER** stated that he possessed approximately 800 images and videos of child pornography, but could not remember how much he had traded over the Internet. **WALKER** said all of the child pornography on his computer was owned by him and that his computer was password protected.

A subsequent computer forensic search of **WALKER**'s computer yielded over 9,000 images and over 1,000 videos depicting minors engaging in sexually explicit activity.

Testimony would establish that all of the images distributed by **WALKER** were of pre-pubescent and pubescent boys less than 18 years of age; to wit: less than twelve (12) years old and that the images of the child victims were "sexually explicit" as defined in Title 18, United States Code, Section 2256. The government would establish that some of the images **WALKER** distributed depicted prepubescent minor children engaged in sex acts with adults including

minors being anally penetrated by adult males. All of the images depicting the sexual victimization of minors distributed by **WALKER** would be introduced through the testimony of HSI agents.

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

Various records and testimonial evidence, including testimony from representatives of Homeland Security Investigations, and other witnesses would also be admitted to prove the facts set forth above.

BRIAN M. KLEBBA
Assistant United States Attorney
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Date

GEOFFREY WALKER
Defendant

Date

GARY SCHWABE
Counsel for Defendant

Date