

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

UNITED STATES OF AMERICA

* **CRIMINAL NO. 20-2**

v.

* **SECTION: "B"**

CHARLES A. LOPEZ, JR.

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* * *

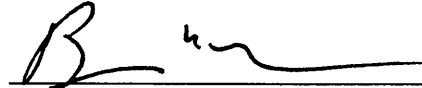
FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of reliable testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in Count 1 of the Indictment now pending against the defendant, **CHARLES A. LOPEZ, JR. ("LOPEZ")**, charging him with a violations of Title 18, United States Code, Sections 2252(a)(2) and (b)(1), namely, receipt of child pornography.

The government would establish that the case against **LOPEZ** developed as a result of an undercover child exploitation investigation conducted by special agents with the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI"). The initial investigation conducted by HSI in Phoenix, AZ revealed **LOPEZ** had accessed a commercial website that primarily contained images of child pornography. HSI determined **LOPEZ's** identity through his IP address and email address [REDACTED] [REDACTED]. On April 25, 2019, HSI agents obtained a federal search warrant for **LOPEZ's** residence at [REDACTED] [REDACTED] [REDACTED] Harahan, LA 70123.

On April 29, 2019, HSI special agents along with the Louisiana Bureau of Investigation (“LBI”) executed the search warrant at **LOPEZ**’s home. Agents advised **LOPEZ** of his *Miranda* rights and, after waiving his rights, he confessed to viewing and downloading child pornography. **LOPEZ** said he knew child pornography was illegal. He viewed child erotica for approximately seven years and has been downloading and viewing child pornography for the last two years. **LOPEZ** admitted to using the search term “preteen” to find child pornography. **LOPEZ** provided the agents with the websites he visited to download child pornography. **LOPEZ** said he viewed child pornography every day or every other day and masturbated to the material. **LOPEZ** said his age preference was for four years or older. **LOPEZ** said he went to the password protected, fee-based website, that was the subject of HSI Phoenix’s investigation. **LOPEZ** explained that he previewed the child pornography on the website and then purchased what he liked. **LOPEZ** said he purchased the password to an encrypted file of child pornography for approximately \$80.00. **LOPEZ** said he used the email address [REDACTED] to receive the password to access the child pornography files. **LOPEZ** said the agents would find thousands of images and videos of child pornography on his MacBook Pro laptop and that he may have some deleted images on his iPhone. According, to **LOPEZ**, 90% of the pornography on his laptop was child pornography.

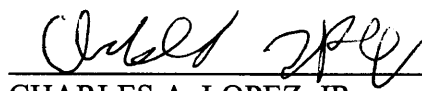
During a subsequent search, HSI computer forensic examiners located over 3,000 images and videos depicting the sexual victimization of children on **LOPEZ's** MacBook Pro computer. The images and videos depict pre-pubescent girls, including toddlers, engaged in sexual acts with adults.


BRIAN M. KLEBBA
Assistant United States Attorney

6/30/21
(Date)


VALERIE WELZ JUSSELIN
Counsel for Defendant

6-30-2021
(Date)


CHARLES A. LOPEZ, JR.
Defendant

6/30/2021
(Date)