

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

UNITED STATES OF AMERICA)
v.)
LARRY CARL HOMAN,)
Defendant.)

CRIMINAL NO. 2:15cr129

STATEMENT OF FACTS

The parties stipulate that the allegations in count one of the indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. In May 2015, a concerned parent in Chesapeake, Virginia, contacted her daughter's school and complained that her daughter's bus driver, defendant LARRY CARL HOMAN ("HOMAN") tickled her daughter. The school contacted the transportation department, which then reviewed footage from the surveillance videos taken on the school bus that HOMAN drove for the school system.

2. The director of human resources interviewed HOMAN, and disclosed the discovery of the content of the videos. Homan was suspended without pay while further review continued of the situation.

3. The Chesapeake Police Department (CPD) was contacted and became involved in the investigation. On June 25, 2015, CPD received and executed a search warrant at HOMAN's apartment in Norfolk, Virginia.

4. Norfolk, Virginia is within the Eastern District of Virginia.

Handwritten initials: SM, CLK, and a signature.

5. A number of electronic media were seized from HOMAN's apartment, including cell phones, digital cameras, a computer, and a flash drive that was hidden inside a clock on HOMAN's wall.

6. CPD forensically analyzed the electronic media and found numerous images of minors that HOMAN used to produce sexually explicit images inside his apartment in Norfolk. Three of those girls have been identified as Jane Doe 1, who was 8 years old at the time of the production, Jane Doe 2, who was 10 years old at the time of the production, and Jane Doe 3, who was 9 years old at that time of the production. There were other images of prepubescent vaginas that were produced with the same computer media, but the victims were unable to be identified from the images themselves.


7. The investigation and evidence reveal that on or about August 8, 2012, in Norfolk, defendant LARRY CARL HOMAN did knowingly employ, use, persuade, induce, entice, and coerce Jane Doe 1, an 8 year old minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and such visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

8. The image of Jane Doe 1 created on August 8, 2012, depicts Jane Doe 1, who is asleep and lying on her back. Her nightgown is pulled up to her neck and she is naked below the waist. The image focuses on Jane Doe 1's pubic area.

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9. The visual depictions of Jane Does 1, 2 and 3 were produced using HOMAN's cellular phone and digital cameras, all of which were produced outside the Commonwealth of Virginia.

DANA J. BOENTE
UNITED STATES ATTORNEY

By: 
Elizabeth M. Yusi
Assistant United States Attorney



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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, LARRY CARL HOMAN, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


LARRY CARL HOMAN

I am LARRY CARL HOMAN's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Keith L. Kimball, Esq.
Counsel for Defendant


KCK