

FILED IN OPEN COURT

7-6-2016

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

CLERK, U. S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

Case No. 3:15-cr-36-J-32JBT

CHAD JASON LANSFORD

**NOTICE OF MAXIMUM PENALTIES, ELEMENTS OF OFFENSE,  
PERSONALIZATION OF ELEMENTS, AND FACTUAL BASIS**

The United States of America, by and through its undersigned Assistant United States Attorney, states as follows:

**A. MINIMUM AND MAXIMUM PENALTIES**

The defendant has indicated his desire and intention to enter a plea of guilty to the charge set forth in Count One of the Indictment. Count One charges the defendant with advertising for child pornography, in violation of Title 18, United States Code, Sections 2251(d)(1)(A) & (2)(B).

Count One is punishable by a mandatory minimum term of imprisonment of not less than 15 years and not more than 30 years, a fine of \$250,000, a term of supervised release of any term of years not less than 5, or life, and a special assessment of \$100, said special assessment to be due on the date of sentencing. Pursuant to Title 18, United States Code, Section 3583(k), if the defendant is required to register under the Sex Offender Registration and Notification Act and commits any criminal felony offense under Title 18, United

States Code, Chapter 109A, 110 or 117, or Sections 1201 or 1591, the Court shall revoke the term of supervised release and require the defendant to serve a term of imprisonment of not less than 5 years and up to life. Any other violation of the terms and conditions of supervised release is punishable by a term of imprisonment of up to 3 years. With respect to this offense and pursuant to Title 18, United States Code, Sections 2259, 3663A and/or 3664, the Court shall order the defendant to make restitution to any victim of the offense(s), and with respect to other offenses, the Court may order the defendant to make restitution to any victim of the offense(s), or to the community, as set forth below..

**B. ELEMENTS OF THE OFFENSE**

The defendant acknowledges understanding the nature and elements of the offense(s) with which defendant has been charged and to which defendant is pleading guilty. The elements of Count One are:

- First:** That the defendant knowingly made, printed or published, or caused to be made, printed or published, any notice or advertisement;
- Second:** That such notice or advertisement seeks or offers to receive, exchange, buy, produce, display, distribute, or reproduce, any visual depiction;
- Third:** That the production of such a visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of a minor child engaged in sexually explicit conduct; and
- Fourth:** That such notice or advertisement was transported using a means and facility of interstate or foreign commerce, that is, by computer via the internet.

C. **PERSONALIZATION OF ELEMENTS**

1. On or about January 2, 2015 at around 6:26 p.m., at Jacksonville, in the Middle District of Florida, did you knowingly make, print or publish, and cause to be made, printed or published, a notice and advertisement which read, "I wanna see same kinda pic wanna see ur tits and ur vagina and face"?

2. Do you admit that this notice and advertisement sought and offered to receive and exchange a visual depiction?

3. Do you admit that the production of such visual depiction involved the use of a minor child engaging in sexually explicit conduct, that, the lascivious exhibit of the child's genitalia, and further that this visual depiction was of such conduct?

4. Do you admit that such notice and advertisement was transported by a means and facility of interstate commerce, that is, by computer via the Internet?

D. **FACTUAL BASIS**

1. **Purpose**

The following facts are set forth to aid the Court in making an inquiry to satisfy it that there is a factual basis for the plea of guilty in accordance with Rule 11(b)(3), Fed. R. Crim. P. The United States reserves its right to provide all relevant information concerning the defendant and the offense committed to the Probation Office and the Court for sentencing purposes.

## 2. Facts

On January 12, 2015, law enforcement officers in the southeastern United States responded to a complaint in which the mother (the "complainant") of a nine year old girl (the "child"), while reviewing her daughter's internet activity, located several sexually explicit images on her daughter's Facebook account. The complainant identified two of the images as depicting her daughter. An on-scene review of the child's iPod Touch device by law enforcement officers revealed online chat conversations between the child and defendant, Chad Lansford. Because Lansford resided in Jacksonville, Florida, the investigation was transferred to the Federal Bureau of Investigation in Jacksonville.

Law enforcement officers were able to preserve the logs of the chat sessions between Lansford and the child, as well as photos and videos that were posted and sent by the child upon Lansford's request. One of these photos depicts the child, who appears to be a prepubescent girl wearing only a training bra. Another photograph depicts the close up of the anus and genitalia of the child and constitutes the lascivious exhibition of the child's genitalia.

The logs of the online conversations between Lansford and the child on Facebook were also reviewed. On January 2, 2015 at 5:51 p.m., Lansford typed, "what u describe my cock after seeing it on facetime?" At 5:56 p.m., Lansford typed "really wanna see all of u since u saw my dick." At 6:03 p.m., the child posted a close up photo of an adult female's vagina. At 6:04 p.m., Lansford responded, "anyway take full body pic pretty plz." At 6:16 p.m., the child posted a

photo of a nude adult female that did not depict the face of the female shown in the photo. At 6:17 p.m., Lansford typed, "c ur face too. how u have piercing ur only 10". The child responded, "My mom let me I got it when I was 9". At 6:18 p.m., Lansford typed, "can i see ur face in it too ur face is very cute also plz just one." At 6:19 p.m., Lansford typed, "just one more with ur face naked then ill send u or show u whatever u want....plz." At 6:24 p.m., the child posted a photo of herself that showed her face, her training bra, and a side view of her buttocks. This photo shows that the child is prepubescent. At 6:25 p.m., Lansford typed, "wanna see ur front tho." At 6:26 p.m., Lansford typed, "i wanna see same kinda pic wanna see ur tits and ur vagina and face" (the basis of Count One). The child refused, typing, "No," and "I sent you 3 pics," and posted a "thumbs up" icon. At 6:28 p.m., Lansford typed, "take one of ur butt but spread ur cheeks out for me." The child responded, "Ok," and at 6:32 p.m., the child produced and posted a photo that depicts her bending over and displaying her buttocks, anus, and vaginal area. Lansford replied, "wonder if I can stuff my cock in ur butt hole," and later asked "have anything shape of a cock u can put in ur butt hole i would love to see it fit". The child replied, "no." After some more conversation, at 7:26 p.m., Lansford typed, "can u do a sexy dance for me that would turn me on". The messages and photos sent by and between Lansford and the child through Facebook were transported over the internet, a facility of interstate commerce.

On March 12, 2015, the FBI and other law enforcement officers executed a federal search warrant at Lansford's apartment on Sunbeam Road in Jacksonville.

Lansford was at the residence, was interviewed, and stated, among other things, the following:

Lansford has lived at the Sunbeam Road address since January 31, 2015. Regarding his Facebook accounts, Lansford advised that his primary account has friends and family members as his Facebook friends. He was shown a screen capture of a Facebook page that featured a picture of him, and he advised that this is his primary account. He was shown the printout of another screen shot which he advised was his secondary Facebook page.

Lansford was then questioned about his contact with a minor female via Facebook and his request for the girl to send sexually explicit photographs of herself to him. He stated that he never chatted with anyone under the age of 18 years old and thought it was "sick" to ask minors to take inappropriate pictures of themselves. He could not recall the name of the child. FBI Special Agent (SA) L. Meyer then showed Lansford screen captures of a chat session from January 2, 2015 between him and the child. Lansford was informed that this chat session was obtained from the child's iPod. Lansford then stated that someone must have messed with his computer. When advised that this theory was not feasible, Lansford advised that he could not recall who established contact but thinks that the child "friended" him on Facebook. He recalled being in contact with the child sometime around the holidays and could not recall how long they remained friends on Facebook, thinking their contact lasted a few days to a week. Lansford advised that he could not recall if the child gave her age. When questioned about

a passage in the chat session where he talked about sending a picture of his penis via Facetime, an online chat application, he responded that he could not recall talking to the child on Facetime.

SA Meyer went through the chat session recovered from the child's iPod Touch device and specifically asked Lansford to comment on the passages "what u describe my cock after seeing it on facetime?" and "really want to see all of u since u saw my dick". From this same chat session, Lansford was asked about the passages "i wanna see same kinda pic wanna see ur tits and ur vagina and face," "take one of ur butt but spread ur cheeks out for me," and "wonder if i can stuff my cock in ur butt hole". Lansford advised that this was a stupid thing to say. Lansford then admitted that it was him in these chat sessions with the child and no one had hacked into his Facebook account. He advised that he "kinda sorta" recalled the child doing a sexy dance. Lansford advised that he did not know the child's age and had no response when SA Meyer showed him a redacted picture of the child showing her face from the chat session. Lansford advised that he now recalled the chat and did not need to see the child's photos. He thought that they had chatted two times over two days but he could not recall the specifics. He advised that her face looks a little familiar stating, "it was a long time ago." He admitted having contact with the child via both Facebook and Facetime, and he is no longer "friends" with her on Facebook. He stated that he never had any

intentions or made plans to meet the child in person, advising that she was too young.

Respectfully submitted,

A. LEE BENTLEY, III  
United States Attorney

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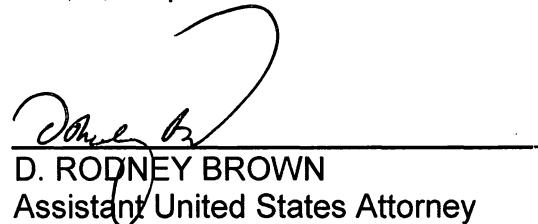
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2016, I filed the foregoing in open court and provided a copy of this document by hand delivery to the following:

Maurice C. Grant, II, Esq.

  
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D. RODNEY BROWN  
Assistant United States Attorney