

FILED IN OPEN COURT

6/16/2020

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

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:19-cr-221(S1)-J-39JRK

AARON KIRK WOOLMAN

PLEA AGREEMENT

Pursuant to Fed. R. Crim. P. 11(c), the United States of America, by Maria Chapa Lopez, United States Attorney for the Middle District of Florida, and the defendant, AARON KIRK WOOLMAN, and the attorney for the defendant, Jeremy Lasnetski, mutually agree as follows:


A. Particularized Terms

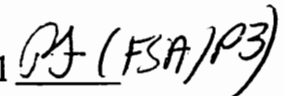
1. Count Pleading To

The defendant shall enter a plea of guilty to Count One of the Superseding Information. Count One charges the defendant with attempted enticement of a minor, in violation of 18 U.S.C. §§ 2422(b) & 2427.

2. Minimum and Maximum Penalties


Count One of the Superseding Information is punishable by a mandatory minimum term of imprisonment of not less than 10 years and up to life, a fine of \$250,000, or both, a term of supervised release of any term of

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AF Approval 

years not less than 5, or life, and a mandatory 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 5 years. With respect to this offense and pursuant to Title 18, United States Code, Sections 2259, 2429, 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.

Additionally, pursuant to 18 U.S.C. § 3014, the Court shall impose a \$5,000 special assessment on any non-indigent defendant convicted of an offense in violation of certain enumerated statutes involving: (1) peonage, slavery, and trafficking in persons; (2) sexual abuse; (3) sexual exploitation and other abuse of children; (4) transportation for illegal sexual activity; or (5) human smuggling in violation of the Immigration and

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Nationality Act (exempting any individual involved in the smuggling of an alien who is the alien's spouse, parent, son or daughter).

3. **Elements of the Offense**

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

- First:** That the defendant knowingly attempted to persuade, induce, entice or coerce an individual to engage in sexual activity, as charged;
- Second:** That the defendant used facilities of interstate commerce, that is, a cellular telephone and a computer via the internet, to do so;
- Third:** That when the defendant did these acts, the defendant believed that such individual was less than eighteen (18) years old;
- Fourth:** That if the sexual activity had occurred, the defendant could have been charged with criminal offenses under the laws of the United States, that is, the crime of production of child pornography in violation of 18 U.S.C. § 2251(a); and
- Fifth:** That the defendant engaged in conduct that constituted substantial steps toward the commission of the crimes and that strongly corroborates the defendant's criminal intent.

4. **Acceptance of Responsibility - Three Levels**

At the time of sentencing, and in the event that no adverse information is received suggesting such a recommendation to be unwarranted, the United States will recommend to the Court that the defendant receive a two-level downward adjustment for acceptance of responsibility, pursuant to USSG § 3E1.1(a). The defendant understands that this recommendation or request is not binding on the Court, and if not accepted by the Court, the defendant will not be allowed to withdraw from the plea.

Further, at the time of sentencing, if the defendant's offense level prior to operation of subsection (a) is level 16 or greater, and if the defendant complies with the provisions of USSG § 3E1.1(b) and all terms of this Plea Agreement, including but not limited to, the timely submission of the financial affidavit referenced in Paragraph B.5., the United States agrees to file a motion pursuant to USSG § 3E1.1(b) for a downward adjustment of one additional level. The defendant understands that the determination as to whether the defendant has qualified for a downward adjustment of a third level for acceptance of responsibility rests solely with the United States Attorney for the Middle District of Florida, and the defendant agrees that the defendant cannot and will not challenge that determination, whether by appeal, collateral attack, or otherwise.

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5. **Dismissal of Original Indictment**

If the Court accepts this plea agreement, the United States will move to dismiss the original Indictment returned against the defendant on December 18, 2019 in this case.

6. **Restitution to Any Minor Victims of Offenses Committed by Defendant, Whether Charged or Uncharged**

Pursuant to 18 U.S.C. § 3663(a)(3), 18 U.S.C. § 3663A(a) & (b), 18 U.S.C. § 3664, 18 U.S.C. § 2248, 18 U.S.C. § 2259, and 18 U.S.C. § 2429, the defendant agrees to make full restitution to all minor victims of his offenses as to all counts charged, whether or not the defendant enters a plea of guilty to such counts and whether or not such counts are dismissed pursuant to this agreement. Further, the defendant agrees to pay restitution to any of his minor victims, for the entire scope of his criminal conduct, including but not limited to all matters included as relevant conduct. The defendant acknowledges and agrees that this criminal conduct (or relevant conduct) includes any minor victim of any child pornography offenses, whether charged or uncharged, under Chapter 110, United States Code, and any minor victim of any violation of federal and/or state law committed by the defendant, including any contact sexual offense. This includes any victim of child pornography depicted in images and/or videos (i) possessed, maintained, and accessed by the defendant in any online cloud storage account, and (ii)

recovered from the defendant's Apple iPhone device seized from the defendant's residence in Hagerman, Idaho by the Federal Bureau of Investigation on December 11, 2019. Further, pursuant to 18 U.S.C. § 3664(d)(5), the defendant agrees not to oppose bifurcation of the sentencing hearing if the victims' losses are not ascertainable prior to sentencing.

7. **Forfeiture of Assets**

The defendant agrees to forfeit to the United States immediately and voluntarily any and all assets and property, or portions thereof, subject to forfeiture, pursuant to 18 U.S.C. § 2428, whether in the possession or control of the United States, the defendant or defendant's nominees. The defendant specifically agrees and consents to the administrative forfeiture of an Apple iPhone device, Model A1688, seized from the defendant by the Federal Bureau of Investigation on December 11, 2019.

If the administrative forfeiture proceeding is not completed prior to sentencing, the defendant agrees and consents to the forfeiture of these assets pursuant to any federal criminal or civil judicial forfeiture action.

The defendant also hereby agrees that the forfeiture described herein is not excessive and, in any event, the defendant waives any constitutional claims that the defendant may have that the forfeiture constitutes an excessive fine. Forfeiture of the defendant's assets shall not be treated as satisfaction of

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any fine, restitution, cost of imprisonment, or any other penalty this Court may impose upon the defendant in addition to forfeiture.

8. Sex Offender Registration and Notification

The defendant has been advised and understands, that under the Sex Offender Registration and Notification Act, a federal law, the defendant must register and keep the registration current in each of the following jurisdictions: the location of the defendant's residence, the location of the defendant's employment; and, if the defendant is a student, the location of the defendant's school. Registration will require that the defendant provide information that includes name, residence address, and the names and addresses of any places at which the defendant is or will be an employee or a student. The defendant understands that he must update his registrations not later than three business days after any change of name, residence, employment, or student status. The defendant understands that failure to comply with these obligations subjects the defendant to prosecution for failure to register under federal law, 18 U.S.C. § 2250, which is punishable by a fine or imprisonment, or both.

B. Standard Terms and Conditions

1. Restitution, Special Assessment and Fine

The defendant understands and agrees that the Court, in addition to or in lieu of any other penalty, shall order the defendant to make restitution

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to any victim of the offense(s), pursuant to 18 U.S.C. § 3663A, for all offenses described in 18 U.S.C. § 3663A(c)(1); and the Court may order the defendant to make restitution to any victim of the offense(s), pursuant to 18 U.S.C. § 3663, including restitution as to all counts charged, whether or not the defendant enters a plea of guilty to such counts, and whether or not such counts are dismissed pursuant to this agreement. The defendant further understands that compliance with any restitution payment plan imposed by the Court in no way precludes the United States from simultaneously pursuing other statutory remedies for collecting restitution (28 U.S.C. § 3003(b)(2)), including, but not limited to, garnishment and execution, pursuant to the Mandatory Victims Restitution Act, in order to ensure that the defendant's restitution obligation is satisfied.

On each count to which a plea of guilty is entered, the Court shall impose a special assessment pursuant to 18 U.S.C. § 3013. The special assessment is due on the date of sentencing. The defendant understands that this agreement imposes no limitation as to fine.

2. Supervised Release

The defendant understands that the offense(s) to which the defendant is pleading provide(s) for imposition of a term of supervised release upon release from imprisonment, and that, if the defendant should violate the

conditions of release, the defendant would be subject to a further term of imprisonment.

3. Immigration Consequences of Pleading Guilty

The defendant has been advised and understands that, upon conviction, a defendant who is not a United States citizen may be removed from the United States, denied citizenship, and denied admission to the United States in the future.

4. Sentencing Information

The United States reserves its right and obligation to report to the Court and the United States Probation Office all information concerning the background, character, and conduct of the defendant, to provide relevant factual information, including the totality of the defendant's criminal activities, if any, not limited to the count(s) to which defendant pleads, to respond to comments made by the defendant or defendant's counsel, and to correct any misstatements or inaccuracies. The United States further reserves its right to make any recommendations it deems appropriate regarding the disposition of this case, subject to any limitations set forth herein, if any.

5. Financial Disclosures

Pursuant to 18 U.S.C. § 3664(d)(3) and Fed. R. Crim. P. 32(d)(2)(A)(ii), the defendant agrees to complete and submit to the United

States Attorney's Office within 30 days of execution of this agreement an affidavit reflecting the defendant's financial condition. The defendant promises that his financial statement and disclosures will be complete, accurate and truthful and will include all assets in which he has any interest or over which the defendant exercises control, directly or indirectly, including those held by a spouse, dependent, nominee or other third party. The defendant further agrees to execute any documents requested by the United States needed to obtain from any third parties any records of assets owned by the defendant, directly or through a nominee, and, by the execution of this Plea Agreement, consents to the release of the defendant's tax returns for the previous five years. The defendant similarly agrees and authorizes the United States Attorney's Office to provide to, and obtain from, the United States Probation Office, the financial affidavit, any of the defendant's federal, state, and local tax returns, bank records and any other financial information concerning the defendant, for the purpose of making any recommendations to the Court and for collecting any assessments, fines, restitution, or forfeiture ordered by the Court. The defendant expressly authorizes the United States Attorney's Office to obtain current credit reports in order to evaluate the defendant's ability to satisfy any financial obligation imposed by the Court.

Defendant's Initials *JLH*

6. Sentencing Recommendations

It is understood by the parties that the Court is neither a party to nor bound by this agreement. The Court may accept or reject the agreement, or defer a decision until it has had an opportunity to consider the presentence report prepared by the United States Probation Office. The defendant understands and acknowledges that, although the parties are permitted to make recommendations and present arguments to the Court, the sentence will be determined solely by the Court, with the assistance of the United States Probation Office. Defendant further understands and acknowledges that any discussions between defendant or defendant's attorney and the attorney or other agents for the government regarding any recommendations by the government are not binding on the Court and that, should any recommendations be rejected, defendant will not be permitted to withdraw defendant's plea pursuant to this plea agreement. The government expressly reserves the right to support and defend any decision that the Court may make with regard to the defendant's sentence, whether or not such decision is consistent with the government's recommendations contained herein.

7. Defendant's Waiver of Right to Appeal the Sentence

The defendant agrees that this Court has jurisdiction and authority to impose any sentence up to the statutory maximum and expressly

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waives the right to appeal defendant's sentence on any ground, including the ground that the Court erred in determining the applicable guidelines range pursuant to the United States Sentencing Guidelines, except (a) the ground that the sentence exceeds the defendant's applicable guidelines range as determined by the Court pursuant to the United States Sentencing Guidelines; (b) the ground that the sentence exceeds the statutory maximum penalty; or (c) the ground that the sentence violates the Eighth Amendment to the Constitution; provided, however, that if the government exercises its right to appeal the sentence imposed, as authorized by 18 U.S.C. § 3742(b), then the defendant is released from his waiver and may appeal the sentence as authorized by 18 U.S.C. § 3742(a).

8. Middle District of Florida Agreement

It is further understood that this agreement is limited to the Office of the United States Attorney for the Middle District of Florida and cannot bind other federal, state, or local prosecuting authorities, although this office will bring defendant's cooperation, if any, to the attention of other prosecuting officers or others, if requested.

9. Filing of Agreement

This agreement shall be presented to the Court, in open court or in camera, in whole or in part, upon a showing of good cause, and filed in this cause, at the time of defendant's entry of a plea of guilty pursuant hereto.

10. Voluntariness

The defendant acknowledges that defendant is entering into this agreement and is pleading guilty freely and voluntarily without reliance upon any discussions between the attorney for the government and the defendant and defendant's attorney and without promise of benefit of any kind (other than the concessions contained herein), and without threats, force, intimidation, or coercion of any kind. The defendant further acknowledges defendant's understanding of the nature of the offense or offenses to which defendant is pleading guilty and the elements thereof, including the penalties provided by law, and defendant's complete satisfaction with the representation and advice received from defendant's undersigned counsel (if any). The defendant also understands that defendant has the right to plead not guilty or to persist in that plea if it has already been made, and that defendant has the right to be tried by a jury with the assistance of counsel, the right to confront and cross-examine the witnesses against defendant, the right against compulsory self-incrimination, and the right to compulsory process for the

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attendance of witnesses to testify in defendant's defense; but, by pleading guilty, defendant waives or gives up those rights and there will be no trial. The defendant further understands that if defendant pleads guilty, the Court may ask defendant questions about the offense or offenses to which defendant pleaded, and if defendant answers those questions under oath, on the record, and in the presence of counsel (if any), defendant's answers may later be used against defendant in a prosecution for perjury or false statement. The defendant also understands that defendant will be adjudicated guilty of the offenses to which defendant has pleaded and, if any of such offenses are felonies, may thereby be deprived of certain rights, such as the right to vote, to hold public office, to serve on a jury, or to have possession of firearms.

11. Factual Basis

Defendant is pleading guilty because defendant is in fact guilty. The defendant certifies that defendant does hereby admit that the facts set forth in the attached "Factual Basis," which is incorporated herein by reference, are true, and were this case to go to trial, the United States would be able to prove those specific facts and others beyond a reasonable doubt.

12. Entire Agreement

This plea agreement constitutes the entire agreement between the government and the defendant with respect to the aforementioned guilty plea

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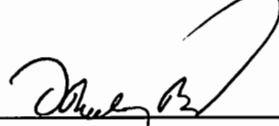
and no other promises, agreements, or representations exist or have been made to the defendant or defendant's attorney with regard to such guilty plea.

13. Certification


The defendant and defendant's counsel certify that this plea agreement has been read in its entirety by (or has been read to) the defendant and that defendant fully understands its terms.

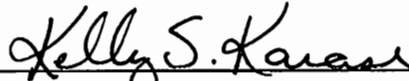
DATED this 16th day of June, 2020.


MARIA CHAPA LOPEZ
United States Attorney


D. RODNEY BROWN
Assistant United States Attorney
Senior Litigation Counsel


AARON KIRK WOOLMAN
Defendant


JEREMY LASNETSKI
Attorney for Defendant


KELLY S. KARASE
Assistant United States Attorney
Deputy Chief, Jacksonville Division

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

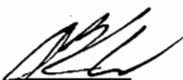
CASE NO. 3:19-cr-221(S1)-J-39JRK

AARON KIRK WOOLMAN

PERSONALIZATION OF ELEMENTS

1. On or about August 7, 2019 through on or about August 21, 2019, in the Middle District of Florida, and elsewhere, did you knowingly attempt to persuade, induce, entice and coerce an individual to engage in sexual activity, that is, the production of child pornography, as charged?
2. Did you use facilities of interstate commerce, that is, a cellular telephone and the internet, to do so?
3. At the time that you performed these acts, did you believe that such individual was less than eighteen (18) years of age, and further that this individual was a nine year old female (the "child")?
4. Do you admit and acknowledge that if this sexual activity had occurred that you could have been charged with a criminal offense under the laws of the United States, that is, the crime of production of child pornography, in violation of 18 U.S.C. § 2251(a)?

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5. Do you admit that you engaged in conduct which constituted substantial steps toward the commission of the crime and which strongly corroborate your criminal intent, that is, among other things, (i) you repeatedly solicited pornographic images of a person whom you believed to be a 9-year-old child from both the "child" and "her" step-parent, (ii) you sent unsolicited pictures of your own penis to the "child" and "her" step-parent, (iii) you sent the "child" a video of an adult female masturbating in an ongoing effort to teach the "child" how to masturbate, and (iv) you specifically instructed the "child" as to how to produce the images and videos of child pornography that you solicited?

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

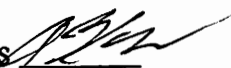
CASE NO. 3:19-cr-221(S1)-J-39JRK

AARON KIRK WOOLMAN

FACTUAL BASIS

On August 7, 2019, an FBI agent began an online undercover operation designed to identify and target adult individuals who were seeking to make contact with and engage in illegal sexual activity with minor children. At the time, the agent was on duty in Texas. While using a particular free mobile chat application that permits users to send text messages, images, video, and other content using the internet, an individual using the user name "awool61" contacted the agent in a particular public group chat room using the application's private chat feature. This chat room was populated by several individuals who had expressed sexual interest in children. The user "awool61" listed his name as "Aaron Woolman" on the home screen for his account, which was visible to the undercover agent. The photo for the user "awool61" depicted the face of a middle-aged male with eyeglasses and a gray goatee, later identified as Aaron Kirk Woolman. During this initial private

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online written conversation, the undercover agent advised the user "awool61" that he had custody of his nine-year-old step-daughter. During this same online chat session, the user "awool61" repeatedly asked the agent to send non-pornographic pictures of the purported nine-year-old step-daughter using the chat application's private online messaging function.

On August 14, 2019, the undercover agent (OCE) had returned to Jacksonville, Florida, and OCE and the user "awool61" engaged in in the following online conversation. OCE: "Hey! Think we chatted last week. Dad here with yng dau, 9." AWOOL61: "Yes I would love to see her." OCE: "Looking for a guy to trust to teach her things. Been talking to her about it." AWOOL61: "Yes I know you were going to get some better pictures to show me." OCE: "U want to chat with her direct? She has phone. Been talking to her about a good friend wanting to show her things. I would be there too." AWOOL61: "I need to download a Phone that my wife cannot say I would love to see a picture of her before we chat." Later in the chat session, the user "awool61" provided OCE with his telephone number as 208-XXX-7687. OCE advised that he had talked to the "child" about the user "awool61," and the user "awool61" typed, "I wish you had a picture of her getting out of the shower she's going to need to show me her little pussy do you think that will be OK?" Later in the same online chat session, the following online written

conversation occurred: AWOOL61: "I love her little titties makes me want to lick them." OCE: "Yeah so hot watching her sleep." AWOOL61: "Yes I'd love to have a peek at that little pussy." OCE: "Don't have that. You can ask her." AWOOL61: "Oh I will and instructor [sic] on how to play with it. I'm getting so hard already how long until she gets home from your time." OCE: "Probably an hour or so.

Later on August 14, 2019, the online chat conversation continued:

OCE: "If I can get some pics tonight, what are you looking for?" AWOOL61: "Anything you can give me wife or daughter. I'm sitting here rockhard right now just thinking about it." At this point in the chat session, user "awool61" sent OCE a photo of an erect adult penis. The chat then continued as follows: AWOOL61: "This is one I would show her." OCE: "Ok. Yeah save that for her." AWOOL61: "It could be her lollipop." OCE: "Yeah man. So nothing in particular you want to see? Wife a no go. Can't risk it." AWOOL61: "Of course I'd love to see her with no panties. Or even a close-up of her little camel toe" (slang term for female genitalia).

On August 15, 2019, the online conversation between the user "awool61" and the undercover agent (OCE) continued: AWOOL61: "You didn't get a picture of her little pussy this morning did you I'll be ready in 10 minutes". OCE: "Good morning. No man her mom was around. Snuck that

shot last night. I will get on later this morning. Sorry for the delay.”


AWOOL61: “No problem can’t wait to see her little pussy and I took some fresh pics when I got out of the shower this morning”. AWOOL61: “I would love to lick her sweet pussy wish we were closer”. OCE: “Yeah me too.”

AWOOL61: “Is she almost ready I’d love to see her eating her little panties with her pussy”.

Subsequent investigation of social media accounts, open source records and telephone subscriber information confirmed that the user name “awool61” resolved to Aaron Kirk Woolman and that he lived in a residence in Hagerman, Idaho. Later on August 15, 2019, the undercover agent provided a cellular telephone number to Woolman so that he could exchange text messages directly with the purported nine-year-old child. Another FBI agent in Jacksonville (OCE 2) assumed the role of the “child” and engaged in written text conversation directly with Woolman using a cellular telephone over the internet. During this conversation, OCE 2 confirmed that the “child” was nine years old. Woolman sent the “child” a picture of his own erect penis and began educating the “child” regarding how to masturbate in an effort to obtain pornographic photos of the “child.” The following conversation occurred: WOOLMAN: “Text me when you get ready to shower. If you take a picture for me I will show you for your fun spots are [sic]. I’ll be here

when you get in the shower.” OCE 2: “Huh? What do you want a pic of? I’m confused again”. WOOLMAN: “If you take a picture of your vagina I will show you where to touch it to give you pleasure feeling no but he hast to know but you wouldn’t me because you’re my special girl [sic]. It’s OK to show me I won’t tell on you. Is it shower time yet. It would be hard for me to describe or for you to touch if I don’t see your vagina I think you’ll love it when I tell you how to do it.”

On August 16, 17, 20, and 21, 2019, Woolman continued to solicit OCE to produce and send him pornographic images of the purported nine-year-old “child.” During online chat conversations, Woolman stated, among things, “Have you gotten any pictures like I asked for yet. You were going to send me pictures of her little pussy remember even if it’s with her panties on” and “Anything I can see I’d love to see her sweet little pussy.” On August 21, 2019, Woolman directly solicited the “child” further through text messages using cellular telephone number 208-XXX-7687, stating, “Just put the camera on your phone in front of your vagina while you are playing with it and take a picture or hold the button for a video. Is it feeling good. I would love to see if you are doing it right.” At that point, Woolman sent the “child” a video depicting a hand masturbating by rubbing an adult female’s genitalia. All of the online chat conversations and the text messages were sent and received by

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Woolman using cellular telephones and the internet, both of which are facilities of interstate commerce.

On December 11, 2019, FBI agents and other officers executed a federal search warrant at Woolman's residence in Hagerman, Idaho. Woolman was at the residence, and he agreed to speak with two FBI agents in a government vehicle, providing, among other things, the following information:

Woolman acknowledged having an Apple iPhone device and an account with the same free mobile chat application (the "app") referenced herein. After some initial denials, Woolman admitted using the app to communicate with "a guy who was pimping out" his underage daughter. After being read some of the messages that he (Woolman) exchanged with OCE and OCE 2, he stated that "it sounds disgusting reading it back." He acknowledged communicating with the "dad" and the nine-year-old "girl" for a "couple of weeks." Woolman also admitted that he had sent the "girl" a picture of his penis and a video of an adult woman masturbating, and he acknowledged that he had asked the "girl" for picture in the shower and pictures of her genitalia.

Woolman was placed under arrest and continued speaking with the agents. He stated, "My life's over. I've ruined my life. It's over today." Woolman consented to a search of his online cloud storage account and



acknowledged that he had downloaded images into the account from the internet but had forgotten that they were there. Later, Woolman stated that his experience with the “guy” in Florida and his daughter was “like a kid reading a storybook who went on an adventure.”

The search of Woolman’s residence resulted in the seizure of the Apple iPhone device (also a cellular telephone) used by Woolman to engage in online communications with the undercover FBI agents (OCE and OCE 2). A forensic review of this device revealed that it contained at least two images depicting a prepubescent minor engaged in masturbation and the lascivious exhibition of the minor’s genitalia. The iPhone also contained photos and videos of Woolman’s penis that he produced while he was in a vehicle, standing in front of a toilet, or lying on a bed in his own bedroom. Woolman sent several of these pornographic photos to OCE and OCE 2 as set forth herein. A consensual search of Woolman’s online cloud storage account revealed that it contained at least two images and at least three videos depicting child pornography. One of the videos depicted a 3-4 year old child being forced to perform oral sex with an adult male.

Woolman acknowledges that there exists a sufficient nexus for purposes of forfeiture between the item(s) specified herein, if any, and the criminal conduct set forth above.

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