If this matter had proceeded to trial, the parties agree that the United States would have proven the facts set forth below beyond a reasonable doubt. The parties agree that the following facts do not encompass all of the facts that would have been proven if this matter proceeded to trial.

The defendant, **GEOFFREY PORTWAY**, a/k/a, Fat Longpig, was born in Spain and is a citizen of the United Kingdom. At all times relevant to this case, **PORTWAY** was a resident of Worcester, Massachusetts.

As part of a long-term international investigation referred to as Operation HOLITNA, Department of Homeland Security, Homeland Security Investigations (HSI) identified individuals belonging to certain discussion groups focused upon the kidnap, torture, murder and cannibalization of children. Through these discussion groups, these individuals were chatting about such interests while also exchanging images containing child pornography. Among others, HSI learned of an individual identified on-line as "Fat Longpig," who was utilizing Skype, Yahoo and other programs to communicate with other like-minded members of the group, to discuss with them how together they could capture, rape and eat young children, as well as to trade child pornography among them. HSI later identified the person using the name "Fat Longpig," which is a reference to cannibalism, as **GEOFFREY PORTWAY**, who resided in and conducted on-line activities from Worcester, Massachusetts.

On July 27, 2012, HSI agents along with the Massachusetts State Police and the Worcester Police Department executed a federal search warrant at **PORTWAY's** residence in Worcester, Massachusetts, of which he was the sole occupant. Among items seized were various computers and digital devices which contained child pornography or were used to facilitate the collection and distribution of child pornography:

- ASUS Laptop #A9NOA5561602389;
- HP Laptop #CNF717OLC7;
- Maxtor HDD #Y64DFSJE;
- Fujitsu 2.5 HDD; and
- Eight Optical Discs.

These items were each manufactured outside of the District of Massachusetts, thus affecting interstate or foreign commerce.

A forensic examination of **PORTWAY's** computers revealed tens of thousands of images and videos depicting the violent rape and sexual exploitation of children to include images of children engaged in sexually explicit conduct. Additionally, the computer contained thousands of images of the physical assault of children, including photos and videos depicting the rape, bondage, torture, and killing of children, as well as photos of dead and mutilated children and the cannibalism of children. Just a few of the child pornography images recovered are described as follows:

- An approximately eight- to ten-year old male boy laying face down with arms and legs bound together behind him. An adult male is standing over the boy and the adult is inserting his penis into the child's mouth.
- A three- to five-year old male face down on a chair flipped over. The child is bound to the chair over the shoulders and knees. The genitalia is exposed and the anus is spread.

• A prepubescent boy, approximately eight- to ten-years old, is naked and lying on his back with his hands pulling his legs apart. There is an adult male inserting his erect penis into the boy's anus.

The last image is one of several images that **PORTWAY** distributed on June 18, 2011 to another individual from these discussion groups, Walrus.Blackhawk. The individual has since been identified as Richard DATES, who resides in New Mexico and was located there when **PORTWAY** sent these images.

The forensic examination uncovered evidence of over 4,500 trades of child pornography between **PORTWAY** and others. Many of these trades involved **PORTWAY** distributing child pornography to others based on their stated specific preferences, including images and videos appearing to depict dead children and the cannibalism of children. **PORTWAY** distributed child pornography images for the receipt of expectation of receipt of a thing of value, namely to obtain other child pornography from the individual to which **PORTWAY** was distributing child pornography.

Furthermore, **PORTWAY** engaged in numerous chats with many individuals about a mutual interest in abducting, raping, murdering, and eating children. Many of these conversations were accompanied by the trading of child pornography and other images of children relevant to the subject at hand. These chats also included multiple images of different real children, accompanied by discussions of desires to sexual abuse and murder and cannibalize the children.

Within these chats, **PORTWAY** solicits several people for their help in abducting a child, mainly from Michael ARNETT of Kansas. At least as early as 2010, **PORTWAY** utilized Skype and other programs to communicate with ARNETT. **PORTWAY** and ARNETT traded child pornography and images of injured, mutilated and deceased children while chatting about the sexual abuse, rape, abduction, murder, and cannibalism of children. Over months, **PORTWAY** repeatedly solicited and endeavored to persuade ARNETT to kidnap a child for him, with the intent that ARNETT would do so and **PORTWAY** would ultimately rape, kill and eat that child. These solicitations for help abducting a child included discussing real children, by name and photo, that ARNETT claimed to know and have access. In the chats, **PORTWAY** and ARNETT discuss different ways to kidnap children and the age range **PORTWAY** prefers. During the time that **PORTWAY** was soliciting ARNETT, he had been told that ARNETT had helped others with such requests before and that he had experience with the abduction and sexual abuse of children. ARNETT has since pled guilty to the sexual exploitation of children for the purposes of producing child pornography in violation of 18 U.S.C. § 2251(a).

During the execution of the search warrant at **PORTWAY**'s residence, HSI agents also discovered a locked door in the basement of the residence. Inside the door was a sally port that led to a second door (with a keyed lock). Inside the second door was a dungeon, which was lined with acoustical sound-deadening material and contained a chair, television, and what appeared to be cable access to the internet. Also located in this room were a child-sized homemade coffin (with large speakers covered in wire mesh at one end) with exterior locking devices, a steel cage (approximately 3' wide, 2' high and 4' long) with multiple locking devices, and a steel table top (with steel rings at 6 points, presumably for restraints). Outside these rooms

were a cabinet freezer, an upright freezer, disposable scalpels, butchering kits, and castration tools. This dungeon was described in detail by **PORTWAY** in recovered chats as a place he intended to use to keep kidnapped children while he sexually abused them and as a place to eventually murder and cannibalize the children.