

This is a document called "Affidavit In Support of Search Warrant".

On page 4 of this "affidavit", Super Special (SS for short) Agent Parsons starts talking about, for lack of a better word, child pornography.

Why would he do that? We know that he has shown himself to be extremely diligent (thereby having earned the SS designation from me) throughout the investigation.

Note the initials at the bottom of both pages (LA=>Judge Lance Affrick, SAP=>Sundanah A. Parsons) indicating that the pages of the affidavit were read by both Judge Affrick and SS Agent Parsons. But again, why talk about "a minor engaging in sexually explicit conduct" when your stated purpose in the "Introduction" is "theft of trade secrets", "criminal infringement of a copyright" and "mail fraud"?

And then, during my Miranda hearing, why did SS Agent Parsons deny talking about, for lack of a better word, kiddie porn in this affidavit? More on this in a later chapter about the Miranda hearing (which I won by the way). Judge Brown even made an interesting comment about the "sloppy" FBI investigation. And, just so no one thinks – oh, this has to be a typo or possibly a secretarial word processor error – the exact same language was used in the "Affidavit in Support of Search Warrant" for Marty Vellozzi's home and server farm. No, this was deliberate and calculated on the part of SS Agent Parsons. This was his very first case as a lead agent and he had to make sure that everything went according to his Federal Vision.

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA

SEALED

IN THE MATTER OF) 12 MAG 07/11-2
THE SEARCH OF:)
THE BUSINESS KNOWN AS)
THE BRINSON COMPANY) Filed Under Seal
124 LAITRAM LANE)
HARAHAN, LOUISIANA 70123)

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Sundanah A. Parsons, being duly sworn, do hereby depose and state:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the New Orleans Division, and I have been a SA since February 1, 2009. I am currently assigned to investigate matters involving computer intrusions, internet fraud, and intellectual property rights violations, in particular Title 18, U.S.C. Section 1832, theft of trade secrets, Title 18, U.S.C. Section 2319, criminal infringement of a copyright, Title 18, U.S.C. Section 1343, wire fraud and Title 18, U.S.C. Section 1341, mail fraud. Prior to investigating intellectual property rights violations, I investigated crimes involving internet fraud, computer intrusions, child pornography, and national security.

WJP

Title 18, U.S.C. Section 1839 defines the term "trade secret" as follows:

(3) all forms and types of financial, business, scientific, technical, economic, or engineering information, including patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or how stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing if—

(A) the owner thereof has taken reasonable measures to keep such information secret; and

(B) the information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable through proper means by, the public; and

Title 18, U.S.C. Section 1343 provides in pertinent part that:

Any person who knowingly possesses 1 or more books, magazines, periodicals, films, video tapes or other matter which contain any visual depiction that has been mailed, or has been shipped or transported in interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer if (i) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct; and (ii) such visual depiction is of such conduct; shall be punished as provided in section (b) of this section. Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both. If the violation occurs in relation to, or involving any benefit authorized, transported, transmitted, transferred, disbursed, or paid in connection with, a presidentially declared major disaster or emergency (as those terms are defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5122)), or affects a financial institution, such person shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

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