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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

NO. 5:25-CR-096-H

CAMILO REYES CASTILLO

FACTUAL RESUME

In support of Camilo Reyes Castillo's plea of guilty to the offenses in Counts One through Seven of the Indictment, Castillo, the defendant; Jeffrey A. Sheets, the defendant's attorney; and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offenses alleged in Counts One, Two, Three, Four, Five, Six, and Seven of the Indictment, each charging a violation of 18 U.S.C. § 2251(a), that is, Production of Child Pornography, the government must prove each of the following elements beyond a reasonable doubt:

First. That the defendant employed, used, persuaded, induced, enticed, coerced a minor to engage in sexually explicit conduct;

Second. That the defendant acted with the purpose of producing a visual depiction or transmitting a live visual depiction of such conduct; and

Third. That the visual depiction was produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

¹ Fifth Circuit Pattern Jury Instruction 2.84 (5th Cir. 2024).

The term "computer" means an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communication facility directly related to or operating in conjunction with such device, but such term does not include an automated typewriter or typesetter, a portable hand held calculator, or other similar device.

The term "minor" means any person under the age of eighteen years.

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"Sexually explicit conduct" means actual or simulated sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; bestiality; masturbation, sadistic or masochistic abuse; or lascivious exhibition of the genitals or pubic area of any person.

Be cautioned that not every exposure of the genitals or pubic area constitutes lascivious exhibition. Whether a visual depiction constitutes a lascivious exhibition requires a consideration of the overall content of the material. You may consider such factors as: (1) whether the focal point of the visual depiction is on the child's genitalia or pubic area; (2) whether the setting of the depiction is sexually suggestive, that is, in a place or pose associated with sexual activity; (3) whether the child is depicted in an unnatural pose or in inappropriate attire, considering the age of the child; (4) whether the child is fully or partially nude; (5) whether the visual depiction suggests sexual coyness or a willingness to engage in sexual activity; and (6) whether the depiction is designed to elicit a sexual response in the viewer. This list is not exhaustive, and no single factor is dispositive.

The term "producing" means producing, directing, manufacturing, issuing, publishing, or advertising.

"Visual depiction" includes undeveloped film and videotape, data stored on computer disk or by electronic means that is capable of conversion into a visual image, and data that is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

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1. Camilo Reyes Castillo, admits and agrees that on or about March 11, 2025, in the Lubbock Division of the Northern District of Texas, and elsewhere, he, the defendant, did employ, use, persuade, induce, coerce, or entice, a person under the age of eighteen years to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted in interstate or foreign commerce, or which visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which visual depiction was produced using materials that had been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer:

Count No.	Visual Depiction File Name
1	IMG_9243
2	IMG_9244
3	IMG_9245
4	IMG_9247
5	IMG_9248
6	IMG_9249
7	IMG_9251

Each count in violation of Title 18, United States Code, Section 2251(a).

2. In February 2025, special agents with the Texas Department of Public Safety (DPS) in Lubbock conducted an interview of a cooperating witness (CW), who was the suspect in a possession of child pornography investigation. During the interview, the CW made multiple admissions, including that he used a social media platform to speak to others about their sexual fantasies with children and to trade child sexual abuse

material. The CW identified an individual he communicated with who went by the username "G Wilkers" and whom the CW had met in person for a sexual encounter on at least one prior occasion. The CW described "G Wilkers" as a heavier set, Hispanic male, who was bald, wore glasses, and lived in Levelland, Texas. The CW told the agents that "G Wilkers" discussed how he sexually abused two male children he had access to when they stayed at his house. The CW provided consent for law enforcement to take over his social media account to identify "G Wilkers."

- From approximately March through May 2025, agents used the CW's 3. social media account to communicate with "G Wilkers" in an undercover capacity. "G Wilkers" provided additional identifying information to the undercover agent, including that he had just started work at a middle school working with students who needed behavior and emotional support. Using the CW's description of "G Wilkers" and the additional information about his employment at a middle school, agents determined that "G Wilkers" was likely Camilo Reyes Castillo.
- DPS analysts identified Castillo's phone number and searched the National 4. Center for Missing and Exploited Children's (NCMEC) database for that phone number. DPS located three NCMEC CyberTips associated with Castillo's phone number. The CyberTips indicated that Castillo's phone number was associated with prior incidents where child pornography was distributed through an email account. Videos associated with that CyberTip depicted the sexual abuse of male children. DPS obtained additional information from the email account, which also linked back to Castillo.

- 5. On June 16, 2025, DPS executed a search warrant at Castillo's residence in Levelland, Texas, which is in the Lubbock Division of the Northern District of Texas. Castillo agreed to speak to agents while his residence was being searched. During the interview, Castillo admitted to groping two male children over the pants while they wrestled and said he recorded one of the children while the child was showering.
- approximately 170 photos and videos of child pornography in the deleted folder.

 Amongst the videos were seven videos of child pornography produced by Castillo of the two male children he admitted to groping while wrestling. The children were John Doe 1, who was 9 years old at the time, and John Doe 2, who was 12 years old at the time.

 The seven videos had a date and time stamp of March 11, 2025, between 12:58 a.m. and 5:00 a.m., and all appeared to be recorded in Castillo's residence in Levelland. The source data from the videos indicated they were all recorded using Castillo's Apple iPhone 15 Pro Max cell phone. The following are descriptions of each of the seven videos:
 - Video name: IMG_9243 was 14 minutes and 26 seconds in length. It depicted the following: Castillo placed the phone on the couch in a position that could capture what was happening on or around the couch in the living room. Castillo then walked over to Doe 1 who was only wearing a white t-shirt. Doe 1 stood up and Castillo pulled Castillo's penis out and rubbed it on Doe 1's leg while Castillo touched and grabbed Doe 1's bare buttocks. Castillo and Doe 1 both left the video frame and then returned

with Doe 1 wearing black pants. Castillo had Doe 1 sit on the couch and Castillo manually, then orally, stimulated Doe 1's penis. Castillo sat on the couch beside Doe 1 and continued manually stimulating Doe 1's penis with his hands. Doe 1 removed his pants and sat on the couch under a blanket while Castillo continued to manually and orally stimulate Doe 1's penis. Castillo then had Doe 1 manually and orally stimulate Castillo's penis. The video concluded with Castillo picking up his phone from the couch and ending the recording. This video was charged as Count One of the Indictment.

- Video name: IMG_9244 was 4 minutes and 58 seconds in length. It
 depicted the following: Doe 1 was fully nude in the bathroom taking a
 shower. Doe 1's penis and anus were exposed in the video. This video was
 charged as Count Two of the Indictment.
- Video name: IMG_9245 was 51 seconds in length. It depicted the
 following: Doe 1 was fully nude in the bathroom taking a shower. Doe 1's
 penis and anus were exposed in the video. This video was charged as
 Count Three of the Indictment.
- Video name: IMG_9247 was 3 minutes and 45 seconds in length. It depicted the following: Castillo was laying on a couch masturbating himself while Doe 2's hand is visible in the video frame. Doe 2 was asleep on the couch next to Castillo. Castillo placed his erect penis in Doe 2's hand and then removed it from Doe 2's hand. He repeated the act of

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placing his penis in Doe 2's hand and removing it several times while Doe 2 appeared to remain asleep. Doe 2 appeared to move his hand and Castillo stopped as if to avoid being caught for what he was doing. This video was charged as Count Four of the Indictment.

- Video name: IMG 9248 was 1 minute and 35 seconds in length. It depicted the following: Castillo was in his living room manually stimulating a male child's penis with his hands. Based on the video and all available information, the child was either Doe 1 or Doe 2, but it is not readily apparent from the video which child it is. This video was charged as Count Five of the Indictment.
- Video name: IMG 9249 was 32 seconds in length. It depicted the following: Castillo was in his living room orally stimulating a male child's penis with his mouth. Based on the video and all available information, the child was either Doe 1 or Doe 2, but it is not readily apparent from the video which child it is. This video was charged as Count Six of the Indictment.
- Video name: IMG 9251 was 3 minutes and 9 seconds in length. It depicted the following: Castillo was in his living room manually stimulating a male child's penis with his hands. Based on the video and all available information, the child was either Doe 1 or Doe 2, but it is not readily apparent from the video which child it is. The video concluded with the child appearing to wake up and Castillo walking away and leaving the room

as if to avoid being caught for what he was doing. This video was charged as Count Seven of the Indictment.

- 7. All seven videos described above meet the federal definition of "child pornography" as defined in 18 U.S.C. § 2256(8). Castillo employed, used, persuaded, induced, coerced, or enticed Doe 1 and Doe 2 to produce child pornography in each of the respective videos. Each video depicted the lascivious exhibition of the genital and pubic area of Doe 1 or Doe 2 or sexually explicit conduct involving Doe 1 or Doe 2. These videos were produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. That is, Castillo produced each of the videos on or about March 11, 2025, using his Apple iPhone 15 Pro Max, model number MU693LL/A, serial number JXRY43V1WF, IMEI: 354689820197673. This cell phone operates as a computer and was manufactured outside the State of Texas, so it was mailed, shipped, or transported in or affecting interstate or foreign commerce prior to its use in Levelland, Texas.
- 8. On June 23, 2025, Doe 1 and Doe 2 were forensically interviewed. Doe 1 disclosed sexual abuse committed against him by Castillo at Castillo's residence. Doe 2 disclosed Castillo wrestled with him, "humped" him, and kissed him on the lips. Doe 1 and Doe 2 described similar conduct occurring as recently as the month when Castillo visited their residence. Both children had sexual assault exams performed. During the sexual assault exam, Doe 1 provided additional disclosures about Castillo's sexual abuse of him.

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- 9. Castillo admits and agrees that he knew Doe 1 and Doe 2 were less than 18 years of age. Castillo also admits and agrees that he employed, used, persuaded, induced, coerced, or enticed Doe 1 and Doe 2 to engage in sexually explicit conduct. He admits and agrees that he acted with the purpose of producing a visual depiction or transmitting a live visual depiction of such conduct. Castillo admits and agrees the visual depictions were produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. That is, Castillo used an electronic device that meets the definition of a "computer" and was manufactured outside the State of Texas to produce the videos of Doe 1 and Doe 2. Castillo admits and agrees that he produced child pornography of Doe 1 and Doe 2, as that term is defined in 18 U.S.C. § 2256(8) and in this factual resume, which are charged in Counts One, Two, Three, Four, Five, Six, and Seven of the Indictment. Castillo admits and agrees that his conduct is a violation of Title 18, United States Code, Section 2251(a), Production of Child Pornography.
- 10. Castillo admits and agrees that he used his Apple iPhone 15 Pro Max to produce the child pornography, and, therefore, Castillo agrees that item should be forfeited to the United States under 18 U.S.C. § 2253.
- 11. The defendant agrees that the defendant committed all the essential elements of the offenses. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Counts One through Seven of the Indictment.

AGREED TO AND STIPULATED on this laday of October

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