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# MEMORANDUM OF POINTS AND AUTHORITIES

#### A. INTRODUCTION

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On August 26, 2021, the defendant, Steven Jackson Rodriguez, was arrested on charges of Production of Child Pornography, in violation of 18 U.S.C. § 2251(a) and (e), Obtaining Custody of a Minor for Purposes of Producing Child Pornography, in violation of 18 U.S.C. § 2251A(b), and Enticement of a Minor to Engage in Criminal Sexual Activity, in violation of 18 U.S.C. § 2422(b). On September 16, 2022, Mr. Rodriguez pled guilty to Counts 1,4,5,6,7,8,9, and 12 of the 18-Count Indictment.

#### B. PERSONAL UPBRINGING

Mr. Rodriguez was born on March 25, 1984, in Los Angeles, California, to Marco Rodriguez and Lucinda Rodriguez. He lived in Los Angeles until the age of nine, when the family relocated to Baldwin Park, California. Mr. Rodriguez comes from a hard-working family. His father worked as a truck driver, while his mother managed the household. Growing up, Mr. Rodriguez had a great relationship with his parents. They provided him and his sister with a safe and loving household.

Mr. Rodriguez recalls one instance of attempted sexual abuse during his childhood. When he was seven years old, a neighborhood kid, who was approximately 10 years old, attempted to try to touch his genitals on two separate occasions. The second incident was reported to his parents by a witness. The kid never attempted to touch him again after that.

C.

#### EDUCATION AND EMPLOYMENT HISTORY

From 1998 to 2002, Mr. Rodriguez attended and graduated from Baldwin Park High School. In 2003, he attended Mount San Antonio College in Walnut, California, but never obtained a degree.

From 2013 to 2016, Mr. Rodriguez was employed at a Psych Hospital in Duarte, California. His duties included taking patients vitals and bathing them. From 2016 to 2018, Mr. Rodriguez was employed as a Behavioral Health Specialist at a Psych Hospital in Covina, California. His duties included caring for patients and taking their vitals. From 2018 to 2019, Mr. Rodriguez was employed with Abel Inc. in Covina, California as a Nursing Assistant. From 2019 up until his arrest, Mr. Rodriguez was employed at College Hospital in Cerritos, California as a Mental Health worker. His main duties were to provide support for patients with psychological problems.

### D. HISTORY OF SUBSTANCE ABUSE

Mr. Rodriguez has a brief history of consuming alcohol and marijuana in the past. He has only consumed alcohol once, which resulted in a DUI arrest. At the age of 28, he tried marijuana and later switched to using a CBD pen once a week.

## E. REQUESTED SENTENCE

By accepting the plea agreement offered to him, Mr. Rodriguez has taken full responsibility for his actions. Mr. Rodriguez respectfully request that the Court imposes a sentence of no more than 30 years imprisonment upon him.

### F. CONCLUSION

Mr. Rodriguez fully comprehends the seriousness of his offense and realizes that he alone is to blame for the situation in which he now finds himself. He is extremely remorseful for his actions and wishes he can take them back. Mr. Rodriguez respectfully request that this Court sentence him to 30 years imprisonment and a five-year period of supervised release. Mr. Rodriguez thanks the Court for considering the defense's position.

Respectfully submitted,

THE MATIAN FIRM A.P.C.

Dated: December 20, 2022

/s/ George K. Rosenstock

GEORGE K. ROSENSTOCK

Attorneys for Steven Jackson Rodriguez