

Indictment

#40299

FILED IN OPEN COURT

DATE: 2/14/22

Deputy Clerk Of Court

Amended

On this 17th day December, 2019, the Grand Jury of the Parish of Livingston, State of Louisiana,
charges that in the Parish, District, and State aforesaid:

CYNTHIA THOMPSON PERKINS

COMMITTED THE FOLLOWING OFFENSES:

COUNT 79

SECOND

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On or about April 5, 2019, the defendant committed ~~FIRST DEGREE RAPE~~, in violation of Louisiana Revised Statute Title 14:42(A)(4) and (A)(5), in that she engaged in oral sexual intercourse with Juvenile Victim 1, a child under the age of thirteen, by forcing the mouth of the victim onto the genitals of DENNIS WALLACE PERKINS, without lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 80

Between May 20, 2019 and May 21, 2019, the defendant committed ~~FIRST DEGREE RAPE~~, in violation of Louisiana Revised Statute Title 14:42(A)(4) and (A)(5), in that she physically assisted DENNIS WALLACE PERKINS in engaging in vaginal sexual intercourse with Juvenile Victim 1, a child under the age of thirteen, without lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 81

On or about June 20, 2019, the defendant committed ~~ATTEMPTED FIRST DEGREE RAPE~~, as a principal, in violation of Louisiana Revised Statute Title 14:27, 14:24, and 14:42(A)(4) and (A)(5), in that, having the specific intent to aid and abet DENNIS WALLACE PERKINS in committing the crime of First Degree Rape by means of vaginal sexual intercourse with Juvenile Victim 1, a child under the age of thirteen, without lawful consent of the victim, and where two or more perpetrators participated in the act, she performed an act for the purpose of, and tending directly toward the accomplishing of her object.

COUNT 82

On or about May 21, 2019, the defendant committed ~~SEXUAL BATTERY OF A CHILD UNDER 13~~, in violation of Louisiana Revised Statute Title 14:43.1(C)(2), in that she forced the hand of Juvenile Victim 1, a child under the age of thirteen, to touch the defendant's genitals while the defendant engaged in vaginal intercourse with DENNIS WALLACE PERKINS, without lawful consent of the victim, and when both offenders are seventeen years of age or older.

COUNT 83

On or about May 21, 2019, the defendant committed **SEXUAL BATTERY OF A CHILD UNDER 13**, in violation of Louisiana Revised Statute Title 14:43.1(C)(2), in that she physically assisted **DENNIS WALLACE PERKINS** in engaging in the intentional touching of the genitals of Juvenile Victim 1, a child under the age of thirteen, without lawful consent of the victim, and when both offenders are seventeen years of age or older.

COUNT 84

On or about June 20, 2019, the defendant committed **SEXUAL BATTERY OF A CHILD UNDER 13**, in violation of Louisiana Revised Statute Title 14:43.1(C)(2), in that she physically assisted **DENNIS WALLACE PERKINS** in forcing the hand of Juvenile Victim 1, a child under the age of thirteen, to grasp the genitals of **DENNIS WALLACE PARKINS**, without lawful consent of the victim, and when both offenders are seventeen years of age or older.

COUNT 85

On or about June 20, 2019, the defendant committed **SEXUAL BATTERY OF A CHILD UNDER 13**, in violation of Louisiana Revised Statute Title 14:43.1(C)(2), in that she engaged in the intentional touching of the anus and genitals of Juvenile Victim 1, a child under the age of thirteen, using any instrumentality or any part of the body of the offender, directly or through clothing, when the victim has not yet attained fifteen years of age and is at least three years younger than the offender, who is over the age of seventeen.

COUNT 86

On or about June 20, 2019, the defendant committed **VIDEO VOYEURISM**, as a principal, in violation of Louisiana Revised Statutes Title 14:24 and 14:283(A)(1)(a) and (B)(4), in that she aided or abetted **DENNIS WALLACE PERKINS** in using a camera, videotape, photo-optical, photo-electric, or any other image recording device, for the purpose of observing, viewing, photographing, filming, or videotaping a person, Juvenile Victim 1, a child under the age of thirteen, without the consent of the victim to the specific instance of observing, viewing, photographing, filming, or videotaping, for a lewd and lascivious purpose, and with the intention of arousing or gratifying the sexual desires of the offender.

COUNT 87

On or about May 25, 2019, the defendant committed **FIRST DEGREE RAPE**, in violation of Louisiana Revised Statute Title 14:42(A)(5), in that she assisted **DENNIS WALLACE PERKINS** in

engaging in vaginal sexual intercourse with Adult Victim 1, without the lawful consent of the victim and whereby two or more offenders participated in the act.

COUNT 88

On or about May 25, 2019, the defendant committed **VIDEO VOYEURISM**, in violation of Louisiana Revised Statutes Title 14:283(A)(1)(a), in that she used a camera, videotape, photo-optical, photo-electric, or any other image recording device, for the purpose of observing, viewing, photographing, filming, or videotaping a person, Adult Victim 1, without the consent of the victim to the specific instance of observing, viewing, photographing, filming, or videotaping, and for a lewd and lascivious purpose.

COUNT 89

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Between May 1, 2018 and February 28, 2019, the defendant committed **MINGLING OF HARMFUL SUBSTANCES**, as a principal, in violation of Louisiana Revised Statutes Title 14:24 and 14:38.1, in that she intentionally aided and abetted **DENNIS WALLACE PERKINS** in mingling a harmful substance or matter with any food or drink with the intent that the same should be taken by any human being to his or her injury.

COUNT 90

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 91

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child

under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 92

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 93

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 94

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 95

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 96

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 97

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 98

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in

violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 99

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 100

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 101

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child

under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 102

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 103

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 104

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 105

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 106

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES** as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 107

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 108

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violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 109

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COUNT 110

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COUNT 111

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under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 112

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 113

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COUNT 114

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COUNT 115

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COUNT 116

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 117

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COUNT 118

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in

violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 119

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

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COUNT 124

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 125

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COUNT 126

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COUNT 128

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in

violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 129

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COUNT 130

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 131

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child

under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 132

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 133

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 134

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 135

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 136

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 137

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 138

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in

violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 139

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 140

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 141

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child

under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 142

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 143

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 144

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 145

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 146

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 147

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 148

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in

violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

COUNT 149

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statute Title 14:24 and 14:81.1(A)(1) and (E)(5)(b), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 1, a child under the age of thirteen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

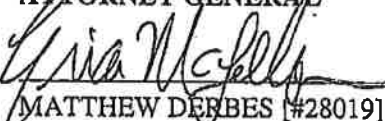
COUNT 150

On or about May 9, 2018, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, as a principal, in violation of Louisiana Revised Statutes Title 14:24 and 14:81.1(A)(1) and (E)(4)(a), in that the defendant, who is over the age of seventeen, intentionally produced an electronic visual representation of pornography involving juveniles depicting a sexual performance involving Juvenile Victim 2, a child under the age of seventeen at the time that the visual representation was created. The electronic visual representation referenced in this Count is mutually exclusive of any other visual representation charged in any other Count of this Indictment.

Contrary to the laws of the State of Louisiana and against the peace and dignity of the same.

JEFF LANDRY,
ATTORNEY GENERAL

BY:


MATTHEW DERBES [#28019]

BARRY MILLIGAN [#27577]

ERICA McLELLAN [#36010]

ASSISTANT ATTORNEYS GENERAL
STATE OF LOUISIANA