

FILED IN OPEN COURT

INDICTMENT

DATE: 12-17-19

AM
Deputy Clerk Of Court.

STATE OF LOUISIANA

21ST JUDICIAL DISTRICT COURT

40299

FOR THE PARISH OF LIVINGSTON

STATE OF LOUISIANA NO. _____ SECTION _____

VERSUS

DENNIS WALLACE PERKINS
36497 ROSALIE AVE
DENHAM SPRINGS, LA 70706
DOB: 08/13/1975, W/M

AND

CYNTHIA THOMPSON PERKINS
36497 ROSALIE AVE
DENHAM SPRINGS, LA 70706
DOB: 04/13/1985, W/F

A TRUE BILL
Cynthia K. Ragusa
BY: Cynthia K. Ragusa, FOREPERSON

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:

DENNIS WALLACE PERKINS

COMMITTED THE FOLLOWING OFFENSES:

COUNT 1

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 he 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 the offender, with the assistance of **CYNTHIA THOMPSON PERKINS**, without lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 2

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 he engaged in vaginal sexual intercourse with Juvenile Victim 1, a child under the age of thirteen, with the assistance of **CYNTHIA THOMPSON PERKINS**, without lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 3

On or about June 20, 2019, the defendant committed **ATTEMPTED FIRST DEGREE RAPE**, in violation of Louisiana Revised Statute Title 14:27 and 14:42(A)(4) and (A)(5), in that, having the specific intent to commit the crime of First Degree Rape, with the assistance of **CYNTHIA THOMPSON PERKINS**, 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, he performed an act for the purpose of, and tending directly toward the accomplishing of his object.

COUNT 4

On or about April 3, 2019, the defendant committed **FIRST DEGREE RAPE**, in violation of Louisiana Revised Statute Title 14:42(A)(4), in that he engaged in oral sexual intercourse with Juvenile Victim 1, a child under the age of thirteen, by touching the genitals of the offender upon the mouth or tongue of the victim and without the lawful consent of the victim.

COUNT 5

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 he engaged in the intentional touching of the genitals of the offender by the victim whereby the defendant, with the assistance of **CYNTHIA THOMPSON PERKINS**, forced the hand of Juvenile Victim 1, a child under the age of thirteen, to touch the defendant's penis while he engaged in vaginal intercourse with **CYNTHIA THOMPSON PERKINS**, when both offenders are seventeen years of age or older.

COUNT 6

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 he engaged in the intentional touching of the genitals of Juvenile Victim 1, a child under the age of thirteen, whereby the defendant, with the assistance of **CYNTHIA THOMPSON PERKINS**, inserted his fingers into the genitals of Juvenile Victim 1, when both offenders are seventeen years of age or older.

COUNT 7

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 he engaged in the intentional touching of the genitals of the offender by the victim whereby the defendant, with the

assistance of **CYNTHIA THOMPSON PERKINS**, forced the hand of Juvenile Victim 1, a child under the age of thirteen, to hold the defendant's penis when both offenders are seventeen years of age or older.

COUNT 8

On or about June 20, 2019, the defendant committed **VIDEO VOYEURISM**, in violation of Louisiana Revised Statute Title 14:283(A)(1)(a) and (B)(4), in that he 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, 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 9

On or about April 23, 2019, the defendant committed **VIDEO VOYEURISM**, in violation of Louisiana Revised Statute Title 14:283(A)(1)(a) and (B)(4), in that he 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, 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 10

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 he engaged in vaginal sexual intercourse with Adult Victim 1 with the assistance of **CYNTHIA THOMPSON PERKINS**, without the lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 11

On or about May 25, 2019, the defendant committed **VIDEO VOYEURISM**, in violation of Louisiana Revised Statute Title 14:283(A)(1)(a), in that he 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 12

On or about November 8, 2014, the defendant committed **FIRST DEGREE RAPE**, in violation of Louisiana Revised Statute Title 14:42(A)(5), in that he engaged in vaginal sexual intercourse with Adult Victim 2 with the assistance of an as yet unidentified adult female perpetrator, without the lawful consent of the victim, and whereby two or more offenders participated in the act.

COUNT 13

On or about November 8, 2014, the defendant committed **VIDEO VOYEURISM**, in violation of Louisiana Revised Statutes Title 14:283(A)(1)(a), in that he 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 2, 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 14

Between June 1, 2019 and June 18, 2019, the defendant committed **SEXUAL ABUSE OF AN ANIMAL**, in violation of Louisiana Revised Statute Title 14:89.3(A)(1) and (A)(7), in that he knowingly and intentionally engaged in sexual contact with an animal, to wit: a dog, and filmed, distributed, or possessed pornographic images of his sexual contact with said animal.

COUNT 15

Between May 1, 2018 and February 28, 2019, the defendant committed **MINGLING OF HARMFUL SUBSTANCES**, in violation of Louisiana Revised Statute Title 14:38.1, in that he intentionally mingled 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 by ejaculating on various pastries and into bottles of energy drinks which were subsequently ingested by unsuspecting victims.

COUNT 16

Between May 1, 2018 and March 31, 2019, the defendant committed **OBSCENITY**, in violation of Louisiana Revised Statute Title 14:106(A)(1), in that he exposed his genitals while in a vehicle, in places open to the public view, with the intent of arousing sexual desire or which appeals to prurient interest or is patently offensive.

COUNT 17

On or about May 9, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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.

COUNT 18

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 19

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 20

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 21

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 22

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 23

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 24

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 25

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 26

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 27

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 28

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 29

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 30

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

Louisiana Revised Statute Title 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 31

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 32

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 33

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 34

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 35

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 36

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 37

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 38

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 39

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 40

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

Louisiana Revised Statute Title 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 41

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 42

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 43

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 44

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 45

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 46

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 47

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 48

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 49

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 50

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

Louisiana Revised Statute Title 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 51

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 52

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 53

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 54

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 55

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 56

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 57

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 58

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 59

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 60

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

Louisiana Revised Statute Title 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 61

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 62

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 63

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 64

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 65

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 66

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 67

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 68

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 69

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 70

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

Louisiana Revised Statute Title 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 71

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 72

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 73

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 74

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 75

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 76

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 77

Between April 1, 2019 and July 31, 2019, and while acting in Livingston Parish, the defendant committed **PRODUCTION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 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 78

Between May 10, 2019 and June 29, 2019, the defendant committed **POSSESSION OF PORNOGRAPHY INVOLVING JUVENILES**, in violation of Louisiana Revised Statute Title 14:81.1 (A)(1) and (E)(4), in that the defendant, who is over the age of seventeen, possessed multiple electronic visual representations of pornography involving juveniles, each depicting a sexual performance by one or more children under the age of seventeen years at the time that the electronic visual representation was produced. The electronic visual representations referenced in this Count are mutually exclusive of any other visual representation charged in any other Count of this Indictment.

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

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

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

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 109

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 110

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 III

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 III2

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 III3

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 III4

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 III5

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 III6

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 III7

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 III8

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.

COUNT 120

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 121

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 122

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 123

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 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

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 126

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 127

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 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

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 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