

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 18-cr-20522-CMA

UNITED STATES OF AMERICA

vs.

BRYAN DENEUMOSTIER,

Defendant.

FACTUAL PROFFER

The United States of America and the defendant, Bryan Deneumostier (“DENEUMOSTIER”), hereby agree that had this case proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt as to counts one and two of the indictment.

1. From 2014 through early 2018, DENEUMOSTIER assisted in the operation of a subscription-based commercial website called www.straightboyz.net (“Straightboyz”). Users could pay approximately \$35.00 a month to stream pornographic videos from the site. The website offered approximately 619 videos of “hook-ups” between DENEUMOSTIER and other men, including Victim 1 and Victim 2. Straightboyz had affiliate marketing programs with several additional pornographic websites, including popular free websites.

2. In many of the videos, including the videos of Victim 1 and Victim 2, the individuals, at Deneumostier’s direction, wore a blindfold and restraints and could not see the defendant or the room in which they were located. The room, however, was in defendant’s residence located in Homestead, Florida, in the Southern District of Florida. Further, unknown to several of the individuals, including Victim 1 and Victim 2, the defendant would make audio

and video recordings of the sexual encounter, without the victim's knowledge or consent, and later post the pornographic videos onto the Straightboyz website.

3. The defendant used Apple devices, including an iPhone and iPad, to make the unauthorized audio and video recordings of his sexual encounters that were later posted onto the Straightboyz website. The defendant had reason to know that such Apple products moved in interstate and foreign commerce, and that the videos he recorded would be sent to a separate person who operated the website out of Madrid, Spain, thus affecting foreign commerce.

4. Specifically, on May 6, 2015 and July 24, 2015, the Defendant audio and video recorded his sexual encounters with Victim 1 and Victim 2, respectively, without Victim 1 and Victim 2's knowledge. Defendant then sent the videos to be posted onto the Straightboyz website. Victim 1 and Victim 2 did not know they were being recorded and did not know that the audio and video recordings of themselves naked and engaged in sexual acts would be posted onto the internet. Victim 1 and Victim 2 never provided their state issued identification cards to the defendant, and never consented to having the videos posted onto the internet.

5. On April 11, 2018, a federal search warrant was executed at defendant's residence in Homestead, Florida. After being read his *Miranda*-rights by special agents for Homeland Security Investigations, defendant admitted that approximately 150 men were featured on his website and approximately 80 did not know they were being recorded. The defendant explained—and as the videos themselves corroborate—that the individuals would, at his direction, blindfold themselves and the defendant would then set up the Apple devices on tripods to film the encounters.

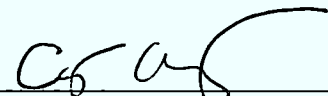
6. During the search, the defendant provided approximately 30 consent forms from men agreeing to have their pornographic films posted online - far short of the 619 videos posted

and featured on the Straightboyz website. Defendant also confirmed that he was paid approximately \$3,000 each month by the website's operators in Spain.

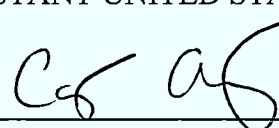
These events occurred in Miami-Dade County in the Southern District of Florida, and elsewhere. The Parties agree that these facts, which do not include all of the facts known to the United States and to the Defendant, are sufficient to prove the guilt of the Defendant as to counts one and two of the above-referenced indictment.

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY

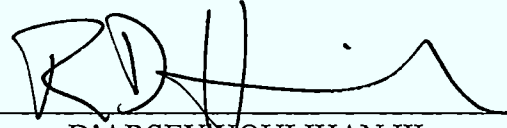
Date: 9/20/18

By: 
CARY O. ARONOVITZ
ASSISTANT UNITED STATES ATTORNEY

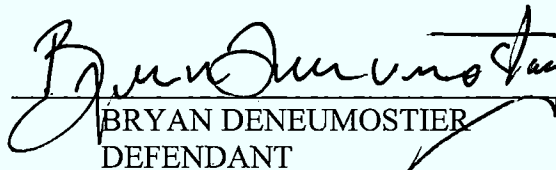
Date: 9/20/18

By:  for
MONA SEDKY
DOJ SENIOR TRIAL ATTORNEY

Date: 9/20/18

By: 
D'ARSEY HOULIHAN III
ATTORNEY FOR DEFENDANT

Date: 9/20/18

By: 
BRYAN DENEUMOSTIER
DEFENDANT