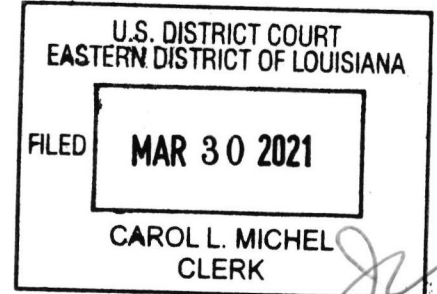


**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL NO. 20-066**
 v. * **SECTION: A**
BRADLEY EDWARD CORLEY *

* * *
FACTUAL BASIS



The defendant, **BRADLEY EDWARD CORLEY** (hereinafter, the “defendant” or “**CORLEY**”), has agreed to plead guilty to Count Two of the Indictment currently pending against him, charging **CORLEY** with possession of child sexual abuse material, in violation of Title 18, United States Code, Section 2252(a)(4)(B). Should this matter proceed to trial, both the Government and the defendant, **BRADLEY EDWARD CORLEY**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

The Government would show that, at all times mentioned in the Indictment, the defendant, **CORLEY**, was a resident of the Eastern District of Louisiana and lived in Marrero, Louisiana. The Government would further establish that on April 27, 2006, **CORLEY** was convicted in the United States District Court for the Eastern District of Louisiana of Possession of Materials Involving the Sexual Exploitation of Minors, in violation of Title 18, United States Code, Section 2252(a)(4)(B), under case number 05-197.

Fee _____
 Process _____
 X Dkt _____
 CtRmDep _____
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 Defense Counsel VWJ

The Government would further present competent testimony and evidence that in about September 2019, Special Agents with the Federal Bureau of Investigation (“FBI”) received a tip that an individual, subsequently determined to be **CORLEY**, had uploaded approximately seven (7) images depicting the sexual exploitation of children to a digital application and distribution platform designed for video gaming communities in about August 2019.

The Government would further present competent testimony and evidence, including the testimony of FBI Alvin J. Thibodeaux, that after further investigation designed to confirm **CORLEY’S** identity, in about March 2020, law enforcement officials executed a search warrant at **CORLEY’S** residence, located in Marrero, Louisiana. Agent Thibodeaux would testify that the FBI seized several electronic items during the execution of the search warrant, including one Toshiba laptop computer, one Samsung Galaxy cellular telephone, one Samsung SGH-404G cellular telephone, and three secure digital (SD) memory cards (collectively, “the Devices”). Subsequently, some of the seized devices were determined to contain files (*i.e.*, images) depicting the sexual victimization of children.

The Government would further present competent testimony and evidence, including the testimony of Special Agent Thibodeaux, that during the execution of the search warrant, **CORLEY** voluntarily spoke with FBI agents and acknowledged, among other things, that he had registered and downloaded numerous file-sharing application to obtain and view sexually explicit depictions of children and had, in fact, obtained and viewed sexually explicit depictions of children.

The Government would further establish through testimony and forensic computer evidence that **CORLEY** knowingly used the Devices to search for, download, and save images

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Defense Counsel VWJ

depicting the sexual victimization of children. Further, the evidence and testimony would establish that a computer forensic search of the seized computers and related evidence revealed at least approximately 60,000 images and approximately 1,500 videos depicting the sexual victimization of children.

Special Agent Thibodeaux and forensic examiners with the FBI would testify that they were able to determine, after reviewing evidence seized during the execution of the aforementioned search warrant, **CORLEY** visited a web forum known to contain images and videos of child sexual abuse material and, on numerous dates, downloaded multiple files depicting the sexual victimization of children. Specifically, on about June 16, 2019, August 4, 2019, and March 9, 2020, **CORLEY** visited a web forum known to contain, and in fact containing, files depicting the sexual exploitation of children. **CORLEY** then downloaded multiple images depicting the sexual victimization of prepubescent minor children.

Forensic evidence consisting of medical testimony, law enforcement officers, and supporting documentation would establish that some of the child victims depicted in the images and videos **CORLEY** searched for, obtained, and possessed were of real, identifiable victims, less than the age of eighteen (18) years old. All of the images depicting the sexual victimization of minors possessed by the defendant would be introduced through the testimony of Special Agents with the FBI.

Forensic evidence and testimony would further establish some of the child victims depicted in the materials possessed by **CORLEY** were of prepubescent children less than eighteen (18) years of age; to wit: less than four (4)-years-old at the time the child sexual abuse material was created. The testimony would further establish that the videos and images of the child victims

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Defense Counsel VWA

depicted them engaging in “sexually explicit conduct,” as defined in Title 18, United States Code, Section 2256. Among the files **CORLEY** searched for, downloaded, and stored were some that portrayed “sadistic or masochistic conduct or other depictions of violence,” including numerous images and videos depicting the sexual penetration of conscious prepubescent females by an adult male.

Further, the Government would present evidence that would establish that the images and videos of child sexual abuse material **CORLEY** searched for, downloaded, and possessed, had been transported in interstate commerce via computer. The Government would also establish, through testimony and documentary evidence, that the equipment used by the defendant to acquire the child sexual abuse material was transported in interstate or foreign commerce.


The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, the Special Agents and forensic examiners from the FBI, other witnesses, documents and electronic devices in the possession of the FBI, and statements made by the defendant, **BRADLEY EDWARD CORLEY**.

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Defense Counsel VWJ

Limited Nature of Factual Basis


This proffer of evidence is not intended to constitute a complete statement of all facts known by **DEFENDANT** and the Government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **DEFENDANT**.

APPROVED AND ACCEPTED:



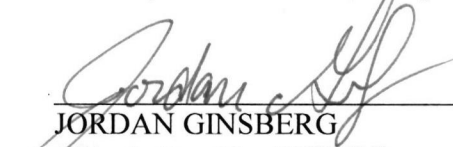
BRADLEY EDWARD CORLEY
Defendant

3/30/2021
Date



VALERIE WELZ JUSSIELIN
(Louisiana Bar No. 19825)
Attorney for Defendant Corley

3-30-2021
Date



JORDAN GINSBERG
(Illinois Bar. No. 6282956)
Assistant United States Attorney

3-30-21
Date