

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-94
 v. * SECTION: "J"
 MICHAEL PAUL PERRILLOUX *
 * * *

FACTUAL BASIS

The defendant, **MICHAEL PAUL PERRILLOUX** (hereinafter, the "defendant" or "PERRILLOUX"), has agreed to plead guilty to Count Four of the Indictment now pending against him, charging him with distribution of child sexual abuse material, in violation of Title 18, United States Code, Section 2252(a)(2). Should this matter proceed to trial, both the Government and the defendant, **MICHAEL PAUL PERRILLOUX**, 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:

Background

The Government would show that, at all times mentioned in the Indictment, the defendant, **MICHAEL PAUL PERRILLOUX**, was a resident of the Eastern District of Louisiana who lived in New Orleans, Louisiana. The Government would further establish through self-authenticating evidence that **PERRILLOUX** was an adult male who was born on [REDACTED]

AUSA JSG
 Defendant MP
 Defense Counsel CCP

Investigation and Proof of Distribution of Child Sexual Abuse Material

The Government would further present competent testimony and evidence that the Federal Bureau of Investigation received a tip, through an intermediary entity, that an individual utilizing a specifically identified username had uploaded images and videos depicting the sexual exploitation of children to an online, cloud-based file storage account. The Government would further establish that law enforcement authorities identified **PERRILLOUX** as the individual responsible for uploading the images and videos. Thereafter, on November 8, 2020, special agents with the FBI, among other law enforcement agencies, executed a search warrant issued by United States Magistrate Judge Dana M. Douglas at **PERRILLOUX'S** residence. Agents also executed a series of warrants at other locations, including his **PERRILLOUX'S** vehicle and his online file storage account. During the execution of the warrants, agents seized and searched certain electronic devices belonging to **PERRILLOUX**. One of those devices, a cellular phone, contained child sexual abuse material (CSAM).

On November 8, 2020, FBI agents made contact with **PERRILLOUX**, who immediately cooperated with law enforcement and voluntarily consented to answering questions posed to him by the agents. During the interview, **PERRILLOUX** provided truthful information and admitted to using certain social media platforms through his cellular device to search for and access links to online file storage accounts that contained CSAM. **PERRILLOUX** further stated that he had used social media accounts to exchange links to file storage sharing accounts containing CSAM.

The Government would further present forensic evidence, as well as the testimony of special agents with the Federal Bureau of Investigation, that confirmed the veracity of the statements **PERRILLOUX** made to law enforcement authorities, including that he had engaged

in the unlawful conduct beginning from at least 2017 until about 2020. Specifically, on certain dates, including December 2, 2017, December 6, 2017, and April 16, 2018, **PERRILLOUX** uploaded images and videos depicting the sexual exploitation of children via a computer and the internet to one or more online, cloud-based file storage accounts under his control. **PERRILLOUX** obtained, uploaded, and catalogued thousands of digital files (*i.e.*, images and videos) depicting the sexual exploitation of children. The Government would further establish through the introduction of forensic digital evidence that **PERRILLOUX** sometimes received payments in exchange for distributing depictions of his collection of CSAM by transmitting electronically a link to one of more of his online file storage accounts. Specifically, on or about September 10, 2018, **PERRILLOUX** received approximately \$200 from Person 1 in exchange for **PERRILLOUX** providing Person 1 a link to an online file storage account under **PERRILLOUX**'s control that contained images and videos depicting CSAM.

Additionally, the Government would introduce forensic evidence that **PERRILLOUX** corresponded with individuals via the internet, including minors, in 2018. During that period, **PERRILLOUX** engaged in sexually suggestive online conversations with the individuals while pretending to be either a female or a younger male. During the conversations, **PERRILLOUX** requested that the minors either engage in sexually explicit conduct or take and send him sexually explicit pictures and videos. For example, on or about February 7, 2018, **PERRILLOUX**, pretending to be a female, corresponded with a male ("Victim") via a social media networking application and engaged sexually suggestive correspondence. During the correspondence, Victim told **PERRILLOUX** that Victim was seventeen years old. Both before and after Victim disclosed his age, **PERRILLOUX** requested sexually explicit images from Victim in exchange for providing sexually explicit images. Victim complied, and in return, **PERRILLOUX** provided

Victim with a sexually explicit image of a female. **PERRILLOUX** saved the sexually explicit image Victim sent him without Victim's consent. **PERRILLOUX** stopped online communications with minors prior to law enforcement contacting him.


Forensic evidence including the testimony of medical experts and law enforcement officers would establish that the child victims depicted in the images **PERRILLOUX** received, possessed, and shared were of real, identifiable victims, less than the age of eighteen (18) at the time the CSAM was created. Testimony would establish that some of the child victims depicted in the materials **PERRILLOUX** qualified as prepubescent children less than 18 years of age within the meaning of the Sentencing Guidelines, and that the images and videos depicted the child victims engaging in "sexually explicit conduct" as defined in Title 18, United States Code, Section 2256. Among those files were some that portrayed images that qualify as "sadistic or masochistic conduct or other depictions of violence" within the meaning of the Sentencing Guidelines. Further, the Government would present evidence that would establish that the images and videos of CSAM **PERRILLOUX** received and distributed 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 and distribute the CSAM was transported in interstate and foreign commerce.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from investigators with the Federal Bureau of Investigation, forensic examiners from the FBI, other witnesses, documents and electronic devices in the possession of the FBI, and the voluntary statements of the defendant, **MICHAEL PAUL PERRILLOUX**.


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**.

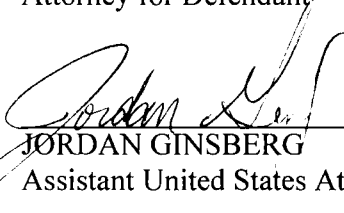
APPROVED AND ACCEPTED:



MICHAEL PAUL PERRILLOUX Date
Defendant



CELIA RHOADS 9/30/21 Date
Attorney for Defendant



JORDAN GINSBERG 9-30-21 Date
Assistant United States Attorney