

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

* CRIMINAL NO.
* 18 U.S.C. §§ 2252A(a)(2)(A) and (b)
* 18 U.S.C. §§ 2251(a) and (e)
* 18 U.S.C. §§ 2422(b) and 2
* 18 U.S.C. § 2253
* 18 U.S.C. § 2428
*
*

VERSUS

DANIEL PERRYMAN COLLINS (01) *
MICHAEL BO PEACOCK (02) *

1:23-cr-00293
Judge Drell
Magistrate Judge Perez-Montes

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**CONSPIRACY TO PRODUCE
CHILD PORNOGRAPHY
18 U.S.C. §§ 2251(a) and (e)**

Beginning on an unknown date but reasonably near to the 1st day of January, 2023 and continuing until on or about the 16th day of November 2023 in the Western District of Louisiana and elsewhere, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, did combine, confederate, agree together and with others both known and unknown to the grand jury, to knowingly employ, use, persuade, induce, entice, and coerce minors to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, in violation of Title

18, United States Code, Section 2251(a), all in violation of Title 18, United States Code, Sections 2251(a) and (e). [18 U.S.C. §§ 2251(a) and (e)].

COUNT 2

**CONSPIRACY TO DISTRIBUTE
CHILD PORNOGRAPHY
18 U.S.C. §§ 2252A(a)(2)(A) and (b)**

Beginning on an unknown date but reasonably near to the 1st day of January, 2023 and continuing until on or about the 16th day of November 2023 in the Western District of Louisiana and elsewhere, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, did combine, confederate, agree together and with others both known and unknown to the grand jury, to distribute child pornography, as defined in Title 18, United States Code, Section 2256(2)(A), using any means and facility of interstate and foreign commerce in violation of Title 18, United States Code, Section 2252A(a)(2)(A), all in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b). [18 U.S.C. §§ 2252A(a)(2)(A) and (b)]

COUNT 3

**ENTICING A MINOR TO ENGAGE
IN CRIMINAL SEXUAL ACTIVITY
18 U.S.C. §§ 2422(b) and 2**

On or about the 24th day of July, 2023, in the Western District of Louisiana and elsewhere, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, using a facility and means of interstate and foreign commerce, did knowingly persuade, induce, entice and coerce a minor under the age of 18, to engage in any sexual activity for which any person could be charged with a criminal offense,

in violation of Title 18, United States Code, Sections 2422 and 2. [18 U.S.C. §§ 2422(b) and 2].

COUNT 4

**ENTICING A MINOR TO ENGAGE
IN CRIMINAL SEXUAL ACTIVITY
18 U.S.C. §§ 2422(b) and 2**

On or about the 3rd day of August, 2023, in the Western District of Louisiana and elsewhere, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, using a facility and means of interstate and foreign commerce, did knowingly persuade, induce, entice and coerce a minor under the age of 18, to engage in any sexual activity for which any person could be charged with a criminal offense, in violation of Title 18, United States Code, Sections 2422 and 2. [18 U.S.C. §§ 2422(b) and 2].

COUNT 5

**ENTICING A MINOR TO ENGAGE
IN CRIMINAL SEXUAL ACTIVITY
18 U.S.C. §§ 2422(b) and 2**

On or about the 29th day of September, 2023 in the Western District of Louisiana and elsewhere, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, using a facility and means of interstate and foreign commerce, did knowingly persuade, induce, entice and coerce a minor under the age of 18, to engage in any sexual activity for which any person could be charged with a criminal offense, in violation of Title 18, United States Code, Sections 2422 and 2. [18 U.S.C. §§ 2422(b) and 2].

**FORFEITURE ALLEGATION
COUNTS 1 AND 2
18 U.S.C. § 2253**

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2251 and 2252A, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting, or traceable to gross profits or other proceeds obtained from the offense[s]; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense[s].

The property to be forfeited includes, but is not limited to, the following:

- a. Cooler Master CPU case s/n rc932kkn51135100189
- b. Synology disc drives s/n 2130ryrnwb00ec s/n 2260pln597900

- c. Kingston USB 3.0 drive 128gb, dtdtse9 g2
- d. Card reader containing 1tb MicroSD card
- e. SurfacePro tablet, model 1866, silver
- f. ClearPHONE, model 620
- g. LG Nexus phone, LGC821
- h. Blue Lenovo laptop, model pf9xb1623174, s/n pf305teh
- i. Toshiba laptop, s/n 1b117919q
- j. Black iPhone
- k. ASUS Nexus tablet
- l. Portfolio of bank documents
- m. Ledger brand USB drive
- n. Red USB drive marked Kinetix
- o. PNY brand 32 gb USB drive, grey in color
- p. PNY 32gb USB drive, SanDisk 8gb SD card, SanDisk microSD adapter with SanDisk 400gb microSD card
- q. Western Digital Easystore HDD s/n 1egez73z
- r. DTSE9 32gb USB drive
- s. Crypto seed
- t. Titan security key Google cloud model K9T

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

**FORFEITURE ALLEGATION
COUNTS 3 THROUGH 5
18 U.S.C. § 2428**

1. The allegations contained in Counts 3 through 5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, the defendants, DANIEL PERRYMAN COLLINS and MICHAEL BO PEACOCK, shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense[s] and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses.

The grand jury adopts those items to be forfeited from the forfeiture allegation related to Counts 1 and 2 as if fully stated herein.

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

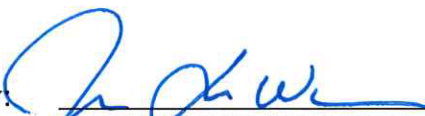
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

REDACTED

FOREPERSON: GRAND JURY

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