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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

JOHN C. ZEREGA

: Hon. Cathy L. Waldor

:

: Mag. No. 11-7141

:

: **CRIMINAL COMPLAINT**

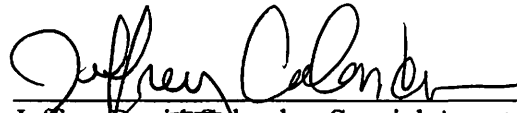
I, Jeffrey David Calandra, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.



Jeffrey David Calandra, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 20, 2011

Date

at

Newark, New Jersey

City and State

Honorable Cathy L. Waldor  
United States Magistrate Judge  
Name and Title of Judicial Officer



Signature of Judicial Officer

**ATTACHMENT A**

From at least as early as on or about October 19, 2011 through on or about November 26, 2011 in Bergen County, in the District of New Jersey, and elsewhere, defendant

JOHN C. ZEREGA

did knowingly distribute at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images were mailed and, using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

## ATTACHMENT B

I, Jeffrey David Calandra, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On two occasions beginning on or about October 19, 2011 through and including on or about November 26, 2011, law enforcement agents accessed a publicly available peer-to-peer file sharing ("P2P") network on the Internet and determined that an individual using an Internet Protocol Address ("IP Address") registered to a golf club at an address located in Bergen County, New Jersey (hereinafter the "Golf Club") had video and image files depicting child pornography in his shared directories contained in his account on the P2P network. Because the individual at the Golf Club had designated these child pornography files as shared files, he made the files available for downloading by, and thereby distributing to, his community of friends on the P2P network.

2. On or about November 26, 2011, undercover agents downloaded child pornography videos and child pornography images from an individual using an IP Address registered to the Golf Club. Three of the files downloaded by law enforcement agents from this individual had filenames and descriptions as follows:

FILENAME	DESCRIPTION
-10-11-12boys-0099.jpg	This image appears to depict three naked prepubescent Caucasian males with dark hair lying on a brown couch. Child one is performing oral sex on child two, while child three is kissing child two. The image is taken from the perspective of an individual looking down at the children.
PHTO0022.jpg	This image appears to depict a naked prepubescent female child with brown hair lying on a white couch. The child is lying on her back with her legs spread open exposing her vagina and anus. A white milky substance appears to be running down her vagina into her anus. The image is taken from the perspective of an individual looking down at the child.
10-11-12boys-0084.jpg	This image appears to depict two naked prepubescent Caucasian boys. One boy has dark hair. The boy with dark hair is performing fellatio on the penis of the other prepubescent Caucasian male.

FILENAME	DESCRIPTION
	Only the genitals of the second boy are visible.

3. On or about November 25, 2011, law enforcement agents accessed a publicly available peer-to-peer file sharing ("P2P") network on the Internet and determined that an individual using an Internet Protocol Address ("IP Address") registered to Stacy Zerega with a primary user of JOHN C. ZEREGA at an address located in Rockland County, New York (the "Rockland County Address") had video and image files depicting child pornography in his shared directories contained in his account on the P2P network. Because the individual had designated these child pornography files as shared files, he made the files available for downloading by, and thereby distributing to, his community of friends on the P2P network.

4. The individual sharing child pornography at the Rockland County Address on or about November 25, 2011 was using the same account on the P2P network as the account sharing files depicting child pornography at the Golf Club on or about October 19, 2011 and on or about November 26, 2011.

5. On or about November 25, 2011, undercover agents downloaded child pornography videos and child pornography images from an individual using an IP Address at the Rockland County Address. Three of the files downloaded by law enforcement agents from this individual had filenames and descriptions as follows:

FILENAME	DESCRIPTION
maxo08_suck.jpg	This image appears to depict two prepubescent Caucasian male children with blond hair. The one child is naked lying on his back on a brown couch with a green towel underneath him. The other child is wearing checkered underwear and is lying on his stomach performing fellatio on the penis of the first child. The lower left corner of the image contains the words "Mr. Wolf 2000 [C]". The image is taken from the perspective of an individual looking at the children.
!!!0906.jpg	This image appears to depict a nude prepubescent Caucasian male child with brown hair lying on the stomach

FILENAME	DESCRIPTION
	of another male. Only the genitals of the other male are visible. Based upon the size of the penis and the amount of pubic hair it appears to be an adult male. The child's legs are spread open exposing his penis and anus. The adult male is lying on a white bed with his jeans pulled down and is maintaining a fully erect penis. The adult male is inserting his erect penis into the anus of the child. The image is taken from the perspective of an individual looking down upon the child.
!!!!!!!!!!!!!!!!!!!!1259851551265.jpg	This image appears to depict a nude prepubescent Caucasian male and a nude prepubescent Caucasian female with brown hair. The female child has a grey hooded jacket on and is wearing a orange and white bracelet on her left arm. The jacket is open and her body is fully exposed. The male child is wearing blue sweatpants, which have been pulled down to his ankles. The children appear to be standing in the woods. The female child is squatting and performing fellatio on the penis of the standing male child. The image is taken from the perspective of an individual looking at the children.

6. Law enforcement officers determined that JOHN C. ZEREGA lived at the Rockland County Address and worked at the Golf Club.

7. On or about December 20, 2011, federal law enforcement officers executed a search warrant at JOHN C. ZEREGA's home at the Rockland County Address. At the scene of the search, law enforcement officers seized a laptop computer. Law enforcement officers determined that the laptop computer contained images depicting child pornography.

8. During the execution of the search warrant, on or about December 20, 2011, law enforcement agents interviewed JOHN C. ZEREGA, who admitted, in substance and in part, that (1) he downloads and shares child pornography using his laptop; (2) he uses his account on the P2P network to download and share child pornography; (3) he is the only person in his home who uses his laptop; (4) he used his laptop to download and share child pornography both at the Golf Club and at the Rockland County address; and (5) he receives sexual gratification from viewing child pornography.

9. Based upon my training and experience, the admissions made by Defendant ZEREGA, and to the best of my knowledge and belief, the images and video described in paragraphs one and three, above, were downloaded from the Internet.