
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 13-4070
 :
 v. : Hon. Michael A. Hammer
 :
 KEVIN REASE : CRIMINAL COMPLAINT

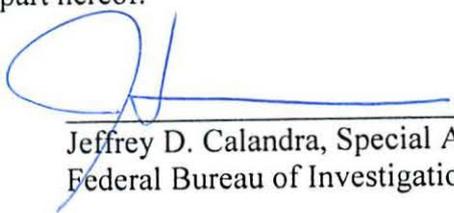
I, Jeffrey D. Calandra, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 page and made a part hereof.



Jeffrey D. Calandra, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on April 23, 2013, at Newark, New Jersey



HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

On or about March 12, 2013, in Passaic County, in the District of New Jersey, and elsewhere, defendant

KEVIN REASE

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been 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) and 2252A(b)(1) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Jeffrey D. Calandra, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. At all times relevant to this Complaint, defendant KEVIN REASE was a registered sex offender residing in Hackettstown, New Jersey. KEVIN REASE was previously convicted in Essex County Superior Court with sexual assault, enticement and endangering the welfare of a child. Defendant REASE was also previously convicted in the District of New Jersey with transportation of child pornography.

The Investigation

2. On or about March 12, 2013, an FBI Special Agent working in an undercover capacity accessed a publicly available peer-to-peer ("P2P") network over the Internet and observed an individual using an assumed name (the "P2P ID") and a certain Internet Protocol ("IP") address that was logged into the network. The investigation revealed that the IP address belonged to a law office located in Paterson, New Jersey (the "Paterson Law Office"). According to the P2P network, the user was sharing twenty (20) password protected folders of files.

3. The undercover agent browsed the shared folders and observed files depicting images of child pornography. Between 12:34 PM and 12:35 PM EST, the undercover agent downloaded from the user's folders approximately 10 image files depicting child pornography. Three of the files downloaded by the undercover agent from the user had filenames and descriptions as follows:

IMAGE	FILENAME	DESCRIPTION
1	mom2son1	This image depicts a pre-pubescent Caucasian toddler boy laying on a blue and white blanket. He is naked and his navel to his mid-thighs is visible. His penis is exposed and a Caucasian female has her tongue on the pre-pubescent boy's penis. The female has her tongue pierced with a silver stud earring.

IMAGE	FILENAME	DESCRIPTION
2	mom2son7	This image depicts a naked Caucasian adult female laying on her back on a blue and white blanket. The female's right arm is up near her face and her left arm is at her side with her left hand resting on her stomach. A naked Caucasian toddler is laying alongside the female. The toddler has his/her left hand on the adult female's vagina and his/her mouth on the female's left breast.
3	128745479382	This image depicts a pre-pubescent naked Caucasian boy laying on what appears to be a bed. His legs are spread and his anus and penis are fully visible.

4. On April 23, 2013, law enforcement officers executed a search warrant at the Paterson Law Office. Employees at the Paterson Law Office identified the computer terminal used by defendant KEVIN REASE (the "Rease Terminal"). The Rease Terminal contained the P2P software and was logged in to the P2P network at that time under the P2P ID referenced above.

5. Among the files law enforcement found on the P2P downloads folder on the hard drive of the Rease Terminal were a number of images of child pornography, as defined by Title 18, United States Code, Section 2256(8), including material that involved prepubescent minors.

6. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images described in paragraph 3 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet via the P2P network.