
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
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STEPHEN LASHER :

I, Lucille M. Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 6, 2006, in Essex County, in the District of New Jersey, and elsewhere, defendant STEPHEN LASHER did:

knowingly and wilfully possess material which contained at least three images of child pornography, as defined in 18 U.S.C. § 2256, which were shipped and transported in interstate and foreign commerce, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

I further state that I am a Special Agent for United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Sworn to before me and subscribed in my presence,
October 17, 2006 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Lucille M. Pezzullo, Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Signature of Judicial Officer

ATTACHMENT A

I, Lucille M. Pezzullo, a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), 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 or about July 6, 2006, law enforcement officers conducted a search of 118 Linden Avenue, Verona, New Jersey, the residence of defendant Stephen Lasher (hereinafter “defendant LASHER”).

2. On or about July 6, 2006, law enforcement officers reviewed the contents of defendant LASHER’s computer hard drives which had been found in defendant LASHER’s residence. Among the files on the hard drive, which were manufactured in Japan and Singapore, were more than fifty (50) images of what appear to be child pornography, as defined by Title 18, United States Code, Section 2256(8). One of the images and two of the videos, which were found on the hard drives located at defendant LASHER’s residence, are described as follows:

- a. **Image Number One:** This image depicts two prepubescent females engaged in sexual conduct. The females are fully nude and seated on what appears to be a blue couch. Their legs are spread apart to the side exposing their genital areas which each female is touching with her own hands.
- b. **Video Number One:** This video depicts a prepubescent female and an adult male engaged in sexual conduct. The prepubescent female is wearing only a pink T-Shirt, and she is touching her genital area with both hands. The erect penis of the adult male is visible as the prepubescent female perform fellatio on the adult male.
- c. **Video Number Two:** This video depicts two prepubescent females and an adult male engaging in sexual conduct. The two females are fully nude and seated in an ivory-colored bathtub facing a nude adult male. The first female begins performing fellatio on the adult male, followed by the second. The adult male then engages in sexual intercourse with the first female.

3. Based upon my training and experience, and to the best of my knowledge, the images described in paragraphs 2a through 2c above, were downloaded from the Internet, based upon, among other things, defendant LAHSER’s own statements.

4. On or about July 6, 2006, law enforcement agents interviewed defendant LASHER who stated, in substance and in part, that a) he had purchased and downloaded images and videos of child pornography from the Internet to the hard drive of his computer; and b) that he believed that the images and videos of child pornography he had viewed depicted actual children.