
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 :
 :
 :
 :
v. :
 :
 :
GEORGE PAYNE :
 :

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 May 4, 2006, in Hudson County, in the District of New Jersey, and elsewhere, defendant GEORGE PAYNE 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 May 4, 2006, law enforcement officers conducted a search of 518 Monroe Street, Apartment 4A, Hoboken, New Jersey, the residence of defendant George Payne (hereinafter “defendant PAYNE”).

2. On or about May 4, 2006, law enforcement officers reviewed the contents of defendant PAYNE’s computer hard drive which had been found in defendant PAYNE’s residence. Among the files on the hard drive, which was manufactured in Hungary, were more than five hundred (500) images of what appear to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of the images, which were found on defendant PAYNE’s computer hard drive, are described as follows:

- a. **Image Number One:** This image depicts the genital area and thighs of a female infant, in addition to portions of her torso and right hand. The infant is nude with the exception of a light blue shirt. The infant appears to be sitting on the lap of an adult male with her legs pointing upward. The right hand of the adult male is holding his penis underneath the anus of the female infant.
- b. **Image Number Two:** This image depicts a prepubescent female performing fellatio on an adult male. The prepubescent female is wearing white underwear with an unidentifiable pattern. The female is seated on a couch, with her legs bent beneath her and her left arm resting on her left knee. The adult male is standing in front of the prepubescent female, and the right side of the adult male is visible from the sternum to the upper shin. He is wearing what appears to be a light purple short sleeved T-shirt and blue shorts. The erect penis of an adult male is visible.
- c. **Image Number Three:** This image depicts an adult male engaging in sexual intercourse with an infant male. The infant male appears to be laying on his back on a white surface. The genital area and upper thighs of the infant are visible and appear to be pointing upward. The penis and lower abdomen and right upper thigh of the adult male are also visible.

3. Based upon my training and experience, and to the best of my knowledge, the images described in paragraphs 2a through 2c above, based upon their location and method of storage on defendant PAYNE’s computer hard drive, were downloaded from the Internet.