

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITES STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 11-
	:	
ROBERT J. PARATORE	:	18 U.S.C. §§ 2252A(a)(3)(B) &
	:	(b)(1), and 18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information, defendant Robert J. Paratore:
 - (a) resided in Mount Royal, New Jersey where he maintained Internet access through an Internet Service Provider;
 - (b) was employed as the chief financial officer for a bioscience research and development firm in Thorofare, New Jersey, which also maintained Internet access through an Internet Service Provider;
 - (b) maintained computers and computer accessories at his residence and at his place of employment which he used to access the Internet to download and upload images and video files, and to view such files, containing visual depictions of minors engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256;

- (c) utilized “Gr8fulhead,” as a user name, user ID, or screen name to mask or otherwise disguise his true identity when using or accessing various web sites and peer-to-peer networks;
- (d) utilized various computer software and programs, including peer-to-peer file sharing applications, which enabled defendant Robert J. Paratore to:
 - i. download child pornography from the computers of others around the world who also utilized similar peer-to-peer file sharing applications, and;
 - ii. share his collection of child pornography by permitting others around the world who utilized similar peer-to-peer file sharing applications to download child pornography from his computer and computer accessories located at his residence while these computers and computer accessories were connected to the Internet.
- (e) posted the following banner through a peer-to-peer file sharing application which offered files for sharing, requested files to be shared by other members of the peer-to-peer network, and gave precautions to other members of the peer-to-peer network in the use of the file sharing application:

“Hello All and Welcome. Once I see
what you have to offer i will open
my files up my files currently over

76gig. If you see any type of user list in my files let me know and i will delete it. USER LISTS SHOULD NEVER BE SHARED. Watch out when you download entire folders, especially with subfolders as they may contain these lists. [The peer-to-peer file sharing application] is left on most of the time so enjoy your downloads.”; and

- (f) offered to other members of the peer-to-peer file sharing network through shared directories on the computers and computer accessories files depicting images and video file of child pornography, that is, any visual depiction of sexually explicit conduct where the production of such visual depiction involves the use of a minor engaging in sexually explicit, conduct, as defined in Title 18, United States Code, Section 2256(8)(A), such files being videos, photographs and digital images with explicitly descriptive file names such that those seeking these visual depictions knew that the files available to download contained an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct, including but not limited to the following:

- i. "2 cp-2yo.suck daddy cock.avi"
- ii. "raped newborn.avi"
- iii. "5 year old getting fucked by brother.wmv"
- iv. "4yo_thaiboy_takes_more_and_more_inches_up_tight_fuckhole.mpg"
- v. "[bibcam] boy+man].avi"
- vi. "Pthc Ptsc 9Yo Jenny Enjoying Her Daddys Doggie Licking Her While Shes Tied Up.jpg"
- vii. "3yo 4yo inna private pthc 031.jpg"
- viii. "Pthc Ptsc 9Yo Jenny Enjoying Her Daddys Doggie Licking Her While Shes Tied Up.jpg"
- ix. "pthc_ptsc jenny_9yo daughters pussy (2).JPG"
- x. "pthc_ptsc jenny_9yo daughter really getting into cock, new (2).jpg"

2. On or about May 29, 2009, defendant Robert J. Paratore offered files depicting images and video file of child pornography, and did distribute approximately 188 such files from his computers and computer accessories in New Jersey through a peer-to-peer file sharing network to a computer in Maryland, such files being videos, photographs and digital images with explicitly descriptive file names such that those seeking these visual depictions knew that the files available to download contained an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct, including, but not limited to the following:

- i. "BabyPlayswithdaddysmeat.jpg"
- ii. "Babyassfuck.jpg"
- iii. "Man_fucks_baby_(real).avi"
- iv. "myrape3.jpg"
- v. "Ptsc 3yo Charlene_ Tonguefuking my toddler girls cunny_her 1st PP orgasm relief,pagan,witch,nudis.mpg"

3. On or about August 24, 2009, defendant Robert J. Paratore offered files depicting images and video file of child pornography, and did distribute approximately 37 such files from his computers and computer accessories in New Jersey through a peer-to-peer file sharing

network to a computer in Maryland, through a peer-to-peer file sharing network, such files being videos, photographs and digital images with explicitly descriptive file names such that those seeking these visual depictions knew that the files available to download contained an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct, including, but not limited to the following:

- i. “!!!!babyfucks5.jpg”
- ii. “!!!NEW tod rape.1.avi”
- iii. “cock suck baby 223 (1).avi”
- iv. “toddler boy - 3yo - just fucked - cum is dripping ~.avi”
- v. “zfx_3yo_Raped_Ass_Fucked_Screams_And_Cries.avi”

4. From on or about May 29, 2009, through on or about September 17, 2009, at Thorofare, Gloucester County, in the District of New Jersey, and elsewhere, the defendant,

ROBERT J. PARATORE,

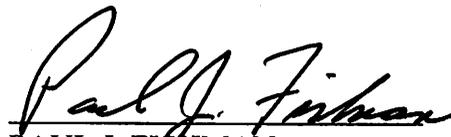
did knowingly advertise, promote, and present material, in interstate commerce, by computer, in a manner that reflected the belief and that was intended to cause another to believe that the material contained an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct, that is, videos, photographs and digital images with explicitly descriptive file names such that those seeking these visual depictions knew that the files available to download contained an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(3)(B) and (b)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in this Information, defendant Robert J. Paratore shall forfeit to the United States pursuant to 18 U.S.C. § 2253, all visual depictions which were produced, transported, mailed, shipped or received in violation of the law; all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and the following personal property used or intended to be used to commit or to promote the commission of the offense which was seized by law enforcement officers on or about September 17, 2009 from Robert J. Paratore on that date at the noted locations:

ITEM	IDENTIFIERS (if any)	LOCATION
42 CDs/DVDs	n/a	Office, Thorofare, NJ
125 CDs/DVDs	n/a	Chevrolet Pickup bearing NJ Reg NPV442, Thorofare, NJ
Acer Computer	S/N PTS560Y05	Residence, Mt. Royal, NJ
Dell Computer	S/N BM338C1	Residence, Mt. Royal, NJ


PAUL J. FISHMAN
United States Attorney