

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 JONATHAN DELAURA, :
 a/k/a "Jon Dulak," :
 :
 Defendant. :
 :
----- x

INFORMATION
12 Cr. 812

COUNT ONE

(Distribution of Child Pornography)

The United States Attorney charges:

1. From on or about May 5, 2011, through on or about May 10, 2011, in the Southern District of New York and elsewhere, JONATHAN DELAURA, a/k/a "Jon Dulak," the defendant, knowingly received and distributed materials that contained child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, DELAURA distributed files containing child pornography from a computer in Jefferson Valley, New York, over the Internet via a file sharing program.

(Title 18, United States Code, Section 2252A(a)(2) and 2252A(b)(1).)

COUNT TWO

(Possession of Child Pornography)

The United States Attorney further charges:

2. On or about February 8, 2012, in the Southern District of New York, JONATHAN DELAURA, a/k/a "Jon Dulak," the defendant, knowingly possessed a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, DELAURA possessed on an iPad in Jefferson Valley, New York, electronic files containing child pornography that had been downloaded from the Internet.

(Title 18, United States Code, Section 2252A(a)(5)(B) and
2252A(b)(2).)

COUNT THREE

(Transfer of Obscene Material)

The United States Attorney further charges:

3. On or about November 25, 2011, in the Southern District of New York, JONATHAN DELAURA, a/k/a "Jon Dulak," the defendant, using the mail and a facility and means of interstate and foreign commerce, knowingly transferred obscene matter to

another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years, to wit, DELAURA used the Internet to send a photograph of a male sitting on a chair with his genital area exposed, holding his erect penis with one hand, to a 15-year-old boy.

(Title 18, United States Code, Section 1470.)

COUNT FOUR

(Commission of a Felony Offense While Registered as a Sex Offender)

The United States Attorney further charges:

4. On or about November 25, 2011, in the Southern District of New York, JONATHAN DELAURA, a/k/a "Jon Dulak," the defendant, being required by Federal and state law to register as a sex offender, knowingly committed a felony offense involving a minor under Title 18, United States Code, Section 1470, to wit, the felony offense described in Count Three of this Information.

(Title 18, United States Code, Section 2260A.)



PREET BHARARA
United States Attorney