
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag No. 17-6089 (SCM)
v. :
ZACHARY MOTTA : CRIMINAL COMPLAINT

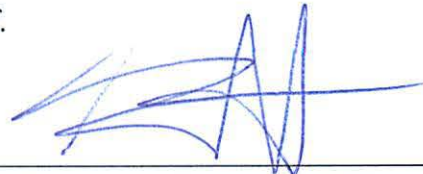
I, Keven Hendricks, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer 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.



Keven Hendricks, Task Force Officer
Federal Bureau of Investigation
(TFO Hendricks attested to this Affidavit by
telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A))

Sworn to and subscribed via telephone,
This 28th day of June 2017 in New Jersey

June 28, 2017
Date

at Newark, New Jersey
City and State

Honorable Steven C. Mannion
United States Magistrate Judge
Name and Title of Judicial Officer

STEVEN C MANNION 5:51
Signature of Judicial Officer *By Direction*

ATTACHMENT A

Count I

Sexual Exploitation of Children

On or about October 11, 2016, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

ZACHARY MOTTA

did knowingly employ, use, persuade, induce, entice, and coerce a minor male, "VICTIM 1," to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

ATTACHMENT B

I, Keven Hendricks, am a Task Force Officer with the Federal Bureau of Investigation ("FBI"). 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 ZACHARY MOTTA ("MOTTA") resided in Iselin, New Jersey and worked as an Emergency Medical Technician ("EMT") and volunteer firefighter.

Sexual Exploitation of Children

2. From at least in or around October 2016 through at least in or around February 2017, defendant MOTTA communicated via Facebook with a minor male ("MINOR VICTIM 1") who resides outside of New Jersey.

3. Beginning in or about October 2016, MOTTA and MINOR VICTIM 1 engaged in sexually explicit communications via Facebook. MOTTA identified himself to MINOR VICTIM 1 as an EMT and volunteer firefighter and sent MINOR VICTIM 1 pictures of MOTTA in his EMT and firefighter uniforms. In certain of the communications, MOTTA referenced responding to 911 calls during their messaging sessions.

4. On or about October 11, 2016, MOTTA asked VICTIM 1 how old he was and MINOR VICTIM 1 responded that he was 12 years of age. MOTTA at the time was 21.

5. In that same conversation, on or about October 11, 2016, MOTTA asked MINOR VICTIM 1, "Hey u able to take pics tonight?" MINOR VICTIM 1 responded, "OK like what?" MOTTA replied, "U know nude pics of u. Just don't get caught."

6. Minutes later, MINOR VICTIM 1 sent MOTTA a close up image of his nude penis via Facebook. MOTTA then asked MINOR VICTIM 1 to also send MOTTA an image of his anus and directed MINOR VICTIM 1 on how to take the image with his phone.

7. In or about November 2016, when MOTTA was 22 years old, MOTTA again asked MINOR VICTIM 1 to send MOTTA a photo of himself. MINOR VICTIM 1 responded with an image of his face. MOTTA then asked MINOR VICTIM 1 to "move the camera down so it is

pointing at ur pants.” MINOR VICTIM 1 then responded by sending two close up images of his penis.

8. 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 paragraphs 6 and 7 above were transported and transmitted 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.

9. On February 24, 2017, MOTTA was interviewed by law enforcement officers and, after being advised of his *Miranda* rights, admitted to 1) communicating via Facebook with MINOR VICTIM 1, 2) receiving nude images of MINOR VICTIM 1, 3) sending MINOR VICTIM 1 images of MOTTA’s penis, and 4) engaging in sexually explicit communications with, and receiving nude images of, other individuals that MOTTA believed to be minors.