
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Stacey D. Adams
 :
 v. : Mag. No. 24-15064
 :
 ANTHONY LAGOTTA, JR. : CRIMINAL COMPLAINT

I, Charles Paddock, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.

Charles Paddock, Special Agent
Federal Bureau of Investigations,

Special Agent Charles Paddock attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) on August __, 2024.

Hon. Stacey D. Adams
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Production of Child Pornography)

On a date in or around 2009 in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY LAGOTTA, JR.,

did knowingly employ, use, persuade, induce, entice, and coerce Minor-Victim-1 and Minor-Victim-2, individuals who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

(Possession of Child Pornography)

On or about August 19, 2024, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY LAGOTTA, JR.,

did knowingly possess material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

ATTACHMENT B

I, Charles Paddock, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. Accordingly, I have personal knowledge of the facts set forth below. Because this criminal Complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this Complaint are related in sum and substance and in part, and all dates and figures are approximate.

1. At times relevant to this Complaint:

a. The Defendant, ANTHONY LAGOTTA, JR. (“LAGOTTA”), lived in Sayreville, New Jersey (the “Sayreville Residence”) from in or around 2009 until in or around 2012.

b. LAGOTTA has lived in his current residence in Plainsboro, New Jersey from in or around May 2023 through today (the “Plainsboro Residence”).

c. “Forum-1” was a criminal forum hosted on the dark web, a portion of the Internet that, although publicly accessible, requires a special configuration to access and is designed and intended for anonymous and untraceable communication. “Forum-1” was dedicated to the exchange of, and discussion about, child sexual abuse material (“CSAM”) and child sexual abuse generally. Forum-1’s users, operating under usernames assigned when they created their Forum-1 accounts, would typically post CSAM.

2. Law enforcement has learned that on or about July 26, 2022, a Platform member with a particular username (“User-1”) made a series of posts, or “thread,” on Forum-1 titled “The day I knew the training was working. True story, with pics” (the “July 2022 Forum-1 Thread”). In the thread, which was approximately 60 paragraphs long, User-1 described in detail, using sexually explicit language, how User-1 had sexually assaulted a then-5-year-old child (“MV1”) approximately 15 years ago. User-1 also attached pictures to the thread illustrating the assault, as described below. User-1 identified MV1 in true name, and also wrote about a second child (“MV2”), whom the USER-1 likewise identified in true name.

3. As part of the July 2022 Forum-1 Thread, User-1 also posted 33 photos depicting CSAM, including one photo depicting what appears to be a

prepubescent child being anally penetrated by an adult Caucasian penis, a second photo depicting what appears to be a prepubescent child being anally penetrated by a sex toy; a third photo depicting what appears to be a prepubescent child receiving oral sex from an adult Caucasian male; and a fourth photo depicting what appears to be a prepubescent child performing oral sex on an adult Caucasian penis.

4. Evidence obtained in this investigation establishes that LAGOTTA has controlled the User-1 moniker on Forum-1 at all relevant times, including when the July 2022 Forum-1 Thread was posted, and that LAGOTTA therefore both produced the CSAM included within that post and posted that CSAM to Forum-1.

- a. **First**, User-1 made another post on Forum-1 on or about January 30, 2024 (the “January 2024 Forum-1 Post”). Based on photos posted by User-1 in that post, law enforcement was able to identify MV1. Law enforcement was then able to identify MV1 and MV2, who are both now adults, as the minor victims in the photographs posted on the Platform by User-1 in the January 2022 Forum-1 Thread.
- b. **Second**, MV1 and MV2 have both confirmed to law enforcement during interviews, after being shown sanitized versions of the CSAM in the July 2022 Forum-1 Thread, that they were the minor victims depicted in the CSAM posted within that thread, that they were sexually abused by LAGOTTA approximately 15 years ago consistent with the abuse described in the January 2022 Forum-1 Thread and depicted in the CSAM photos, and that they recognized the Sayreville Residence in which those images were captured—based on the backdrop depicted in those images. MV1 and MV2
- c. **Third**, law enforcement has learned that the username of User-1 consists of a certain nickname followed by a series of numbers. Those numbers, law enforcement has further learned, are consistent with the birthdate of MV2.
- d. **Fourth**, on or about August 19, 2024, law enforcement executed a lawfully obtained search warrant at LAGOTTA’s Plainsboro Residence. Law enforcement discovered and seized computer equipment belonging to LAGOTTA. A preliminary examination revealed that at least two of LAGOTTA’s hard drives contained photos depicting CSAM of MV1, including one photo involving a sex toy that User-1 used as his profile photo on Forum-1. Law enforcement also discovered a folder titled [MV1’s first name] that contained approximately 700 images of MV1, the far majority of which depicted CSAM.

5. 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 3 and 4(b) above traveled in interstate commerce, via the Internet.