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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. Steven C. Mannion  
v. : Mag. No. 18-6154  
GEORGE KARKANTZELIS : **CRIMINAL COMPLAINT**

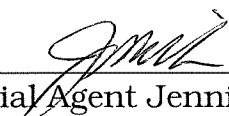
I, Jennifer Miller, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Special Agent Jennifer Miller  
Department of Homeland Security  
Homeland Security Investigations

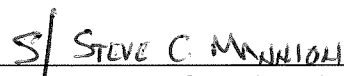
Sworn to before me and subscribed in my presence,

July 26, 2018  
Date

at

Essex County, New Jersey  
County and State

HONORABLE STEVEN C. MANNION  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

On or about May 6, 2018, in Bergen County, in the District of New Jersey and elsewhere, the defendant

**GEORGE KARKANTZELIS**

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

## **ATTACHMENT B**

I, Jennifer Miller, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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 GEORGE KARKANTZELIS ("KARKANTZELIS") was a resident of Cliffside Park, New Jersey.

### **The Investigation**

2. In or about May 2018 and, again, in or about July 2018, undercover law enforcement officers accessed a publicly available peer-to-peer ("P2P") network over the Internet and observed that a computer with a certain Internet Protocol ("IP") address was logged into the network. The investigation revealed that this IP address was associated with a computer used by an individual later identified as defendant KARKANTZELIS. Law enforcement documented KARKANTZELIS sharing multiple files suspected of depicting child pornography.

3. On or about May 6, 2018, law enforcement downloaded numerous files containing what appeared to be child pornography via the P2P network from the computer with the IP address associated with KARKANTZELIS. Specifically, law enforcement downloaded 64 image files and 2 video files containing what appeared to be child pornography from KARKANTZELIS. Three of the files downloaded from KARKANTZELIS are described as follows:

<b>FILENAME</b>	<b>DESCRIPTION</b>
File Name/Number: 1414027753546	This image, which was contained in a folder labeled "Tropical Cuties," and, in turn, in a subfolder entitled "TC random pics," depicts a heavy set adult male standing in profile on the right side of the image facing to the left. The adult male is visible from his chest to his mid-thighs, and appears to be nude with the exception of a purple towel around his waist from which his erect penis protrudes. In the left portion of

FILENAME	DESCRIPTION
	the image, a prepubescent girl with long brown hair is kneeling in profile facing toward the adult male and holding his penis with her right hand. The girl appears to be between 6 and 9 years of age and appears to be nude. The left foot of what appears to be another female is visible in the lower left hand corner of the photo.
File Name/Number: 1414713137976	This image, which was contained in a folder labeled "Tropical Cuties," and, in turn, in a subfolder entitled "TC random pics," depicts a close up of a prepubescent who appears to be between 8 and 10 years in age with long wavy brown hair. Visible in the lower left foreground of the image is a semi-erect uncircumcised adult penis, and the man's left foot can be seen. The girl, who appears to be lying on top of the adult male's legs, is holding the base of his penis with her right hand while licking the penis with her tongue. Partially visible in the right background of the image is what appears to be a standing adult nude male, most of whom is beyond the right border of the image. There appears to be a nude female of indeterminate age kneeling in front of him with her back to the camera.
File Name/Number: 1414027807891	This image, which was contained in a folder labeled "Tropical Cuties," and, in turn, in a subfolder entitled "TC random pics," depicts two nude prepubescent girls with medium length dark hair who are lying on their backs on a bed with white sheets with pink stripes with their heads resting on white pillows. A wood paneled wall with carved designs is visible behind them. The girls are lying with their legs spread exposing their vaginas. The girl on the left is holding in her left hand a large pink sex toy with a black base. She is placing its tip on the vagina of the girl to the right of the image.

4. On or about July 3, 2018, law enforcement conducted another undercover P2P session during which dozens of images of child pornography were downloaded from the IP Address associated with KARKANTZELIS. These images included multiple depictions of babies and toddlers being sexually assaulted by adult males.

5. On or about July 26, 2018, law enforcement executed a lawfully obtained search warrant at KARKANTZELIS's residence in Cliffside Park, New

Jersey (the "residence"). At the residence, law enforcement discovered computer equipment belonging to KARKANTZELIS. A preliminary forensic review of the computer revealed evidence of a number of the same child pornography files previously downloaded from KARKANTZELIS by undercover law enforcement via the P2P network.

6. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the files described in paragraph 3 above traveled in interstate commerce, that is, the images were downloaded by law enforcement from the Internet via the P2P network.