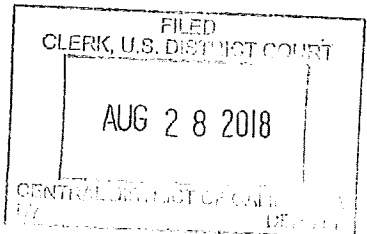


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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN EDWARD ZERETZKE,

Defendant.

CR No. **18CR00549-FMD**

I N D I C T M E N T

[18 U.S.C. §§ 2251(a), (e):
Production of Child Pornography;
18 U.S.C. § 2422(b): Use of a
Facility of Interstate Commerce to
Attempt to Induce a Minor to
Engage in Criminal Sexual
Activity; 18 U.S.C. § 2423(b):
Travel With Intent to Engage in
Illicit Sexual Conduct; 18 U.S.C.
§§ 2252A(a)(2)(A), (b)(1): Receipt
of Child Pornography]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2251(a), (e)]

On or about February 8, 2017, in Los Angeles County, within the
Central District of California, and elsewhere, defendant JOHN EDWARD
ZERETZKE knowingly employed, used, persuaded, induced, enticed, and
coerced VICTIM 1, an individual who had not attained the age of 18
years, to engage in sexually explicit conduct, as defined in Title
18, United States Code, Section 2256(2)(A), for the purpose of

1 producing a visual depiction of such conduct, which visual depiction
2 was actually transported and transmitted using a means and facility
3 of interstate and foreign commerce and in and affecting interstate
4 and foreign commerce.

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1 4. On or about November 8, 2015, during a chat on Facebook,
2 defendant ZERETZKE sent VICTIM 2 approximately 26 photographs of
3 defendant ZERETZKE masturbating to ejaculation.

4 5. On or about November 8, 2015, during a chat on Facebook,
5 defendant ZERETZKE told VICTIM 2 that he wanted "to see a photo of
6 your pussy...up close."

7 6. On or about November 8, 2015, during a chat on Facebook,
8 defendant ZERETZKE indicated a sexual interest in VICTIM 2, and
9 described, in detail, how he would like to have sex with VICTIM 2.

10 7. On or about December 15, 2015, defendant ZERETZKE told
11 VICTIM 2 that he sent her a pair of cowboy boots as a Christmas gift.

12 8. On or about December 22, 2015, during a chat on Facebook,
13 after VICTIM 2 sent defendant ZERETZKE photographs of VICTIM 2
14 wearing the cowboy boots, defendant ZERETZKE asked VICTIM 2 to send
15 him additional photographs.

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COUNT THREE

[18 U.S.C. § 2423(b)]

Between on or about August 20, 2017, and on or about September 23, 2017, defendant JOHN EDWARD ZERETZKE ("ZERETZKE"), a citizen of the United States, knowingly traveled in foreign commerce, from the United States to the Philippines, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), namely, a sexual act as defined in Title 18, United States Code, Section 2246, with a person between twelve and sixteen years of age who was at least four years younger than defendant ZERETZKE, and a commercial sex act, as defined in Title 18, United States Code, Section 1591, with a person under eighteen years of age.

COUNT FOUR

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about August 17, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant JOHN EDWARD ZERETZKE ("ZERETZKE") knowingly received, into his Facebook account, 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, had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant ZERETZKE received was a video titled "unified_message_10213035452617085.mp4."

COUNT FIVE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]


On or about August 19, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant JOHN EDWARD ZERETZKE ("ZERETZKE") knowingly received, into his Facebook account, 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, had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant ZERETZKE received was a video titled "unified_message_10213048587945460.mp4."

A TRUE BILL

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Foreperson

NICOLA T. HANNA
United States Attorney


LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

JUSTIN R. RHOADES
Assistant United States Attorney
Chief, Violent & Organized Crime
Section