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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 2 and 2251(a))

JON CONSIGLIO,

No. 26-MJ-19

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

NINA SCARAMELLA, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about December 2024, within the Eastern District of New York and elsewhere, the defendant JON CONSIGLIO did knowingly and intentionally employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2 and 2251(a))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since March 2024, and I am currently assigned to the New York Office (“FBI NY”). I am currently assigned to the FBI Child Exploitation and Human Trafficking Task Force (CEHTTF), which is made up of members of both the FBI and the New York City Police Department. As a Special Agent, I investigate violations of criminal law relating to the sexual exploitation of children. I have participated in multiple federal criminal investigations into the sexual exploitation of children as well as the production, receipt, distribution, and possession of child pornography. I have received formal and on the job training on investigative techniques and methods of operation in the areas of child exploitation and child pornography.

2. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

3. As described below, there is probable cause to believe that the defendant JON CONSIGLIO has engaged in the production, manufacturing, and possession of Child Sexual Abuse Material (CSAM) involving a minor victim in Staten Island, New York .

4. In January 2026, law enforcement received a report from an acquaintance of JON CONSIGLIO, John Doe, that a cellphone provided by JON CONSIGLIO contained CSAM.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. In or around November 2025, in Staten Island, New York, the defendant JON CONSIGLIO gave Jane Doe #1, the girlfriend of John Doe, one of his cellphones for her to use. On or about January 25, 2026, once Jane Doe #1 no longer needed the cellphone, Jane Doe #1 let her sister, Jane Doe #2, use the cellphone JON CONSIGLIO gave her.

6. On or about January 25, 2026, in Staten Island, New York, Jane Doe #2 discovered three CSAM files, which are two videos and an image depicting a minor female engaging in sexual acts with an adult male.

7. On January 26, 2026, Law Enforcement Officer (LEO) 1, LEO 2, LEO 3, and LEO 4 of the FBI CEHTTF interviewed John Doe, Jane Doe #1, Jane Doe #2. During the interview, the LEOs reviewed the cellphone JON CONSIGLIO gave Jane Doe #1 and found a CSAM image and two CSAM videos saved in JON CONSIGLIO's cellphone. The following are descriptions of the CSAM files found on JON CONSIGLIO's cellphone:

- a. **IMG_0013** is an image depicting a female child, approximately 2 years old, engaging an adult male in oral sex.
- b. **VID_0017** is a video, from 12/13/2024, approximately 3 minutes and 24 seconds long depicting a nude female, approximately 2 years old, fully nude, jumping on the bed in front of an adult who is taking the video. The adult male's erect penis is exposed. The female child rolls forward exposing her vagina and anus which is then touched by the adult male. The female child engages in oral sex with the adult male. The female child continues to jump on the bed nude in front of the adult male.
- c. **VID_0014** is a video, from 12/07/2024, approximately 4 minutes and 37 seconds long depicting a female nude from the waist down engaged in vaginal sex on top of an adult male. The female child then gets off the adult male and rubs the adult

male's erect penis. The adult male also gives the female child lubricant to rub on her hands, and she masturbates the adult male. The adult male then requests the female child rub her nude bottom against his erect penis.

8. John Doe and Jane Doe #1 confirmed the female minor victim depicted in the CSAM image and videos is Child Victim #1. John Doe and Jane Doe #1 also noted that the male voice in both videos resembles JON CONSIGLIO's voice.

9. On January 26, 2026, the LEOs interviewed Jane Doe #3. Jane Doe #3 was shown the CSAM image and identified Child Victim #1 as the minor in the CSAM image. Jane Doe # 3 listened to the audio of the CSAM videos and identified the male's voice in the CSAM videos as JON CONSIGLIO's voice.

10. On January 26, 2026, Jane Doe #3 sent an iCloud link to LEO 1 containing 40 files, to include 39 photos and one video of JON CONSIGLIO and JON CONSIGLIOS PREMISES, which is located in Staten Island, New York. The 40-second-long video, hereinafter referred to as the iCloud video, provided by Jane Doe # 3, was created on or about November 2, 2024, and contains footage of JON CONSIGLIO's bedroom and living conditions. The background of the CSAM videos matches the iCloud video of JON CONSIGLIO's bedroom.

11. On January 27, 2026, a member of the FBI's CEHTTF, LEO 5, conducted a further analysis of the CSAM videos, and recognized that the male depicted in both CSAM videos has tattoos on his hands, which were also identified in JON CONSIGLIO's social media profile.

WHEREFORE, I respectfully request that defendant JON CONSIGLIO be dealt with according to law.

NINA SCARAMELLA
Special Agent
Federal Bureau of Investigation

Sworn to before me this
28th day of January, 2026

THE HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK