



TRUE AND CERTIFIED COPY

Scott P. Cregan

4:31 pm, Nov 16 2021

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. André M. Espinosa
	:	
v.	:	Mag. No. 21-11325
	:	
MARCEVAN MANASSE	:	CRIMINAL COMPLAINT
	:	
	:	

I, Bradley J. Benwell, 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 Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), assigned to the Special Agent in Charge in the District of New Jersey, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Handwritten signature of Bradley J. Benwell

Bradley J. Benwell, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

November 16, 2021
Date

at Essex County, New Jersey
County and State

Honorable Andre M. Espinosa
United States Magistrate Judge
Name and Title of Judicial Officer

Handwritten signature of Andre M. Espinosa
Signature of Judicial Officer

ATTACHMENT A

Count 1 – Distribution of Child Pornography

From on or about September 20, 2020 through on or about November 22, 2020, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

MARCEVAN MANASSE

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

ATTACHMENT B

I, Bradley J. Benwell, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, 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 Marcevan Manasse (“MANASSE”) was a resident of Somerville, New Jersey.

The Investigation

2. From on or about September 20, 2020 through on or about November 22, 2020, law enforcement conducted an undercover online session (the “2020 Session”) using a publicly-available peer-to-peer (“P2P”) software application program (the “P2P Program”). P2P is a method of communication available to Internet users through the use of special software. The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together. Generally, when P2P software is installed on a computer, the user is directed to specify a “shared” folder. All files placed in that user’s “shared” folder are available to anyone on the world wide network for download. A person interested in sharing child pornography with others in the P2P network need only place those files in his or her “shared” folders. Those child pornography files are then available to all users of the P2P network for download regardless of their physical location. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce.

3. The P2P Program allowed users to connect to and share, search and download content. The version used by law enforcement allows law enforcement to determine the IP address through which target computers access the Internet.

4. During the 2020 Session, a computer user (the “Computer”) shared multiple files of child pornography using the P2P Program. The undercover law enforcement officer established a direct connection to the Computer. Several of the files being shared by the Computer had a hash value that has been identified to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the 2020 Session by the Computer using a particular IP

Address (“IP Address 1”). Video files and images of child pornography were available from the IP Address 1, which other users accessing the P2P Network could download. Indeed, during the 2020 Session, law enforcement downloaded five video files and eleven images containing child pornography from the Computer, which was utilizing IP Address 1. The files included multiple visual depictions of pre-pubescent children engaged in sexual acts with adults, including the following representative sample:

Filename	Description
<p>File Name/Number: ...[Jao Loli] Japan 6Yo Lolita (Pthc) Meikko 2 Drugged, Passed Out And Raped 2.mpg</p>	<p>The video begins with a prepubescent female laying on a bed, visible from the waist down wearing a white multi-colored sweater and white panties. At approximately 1:00 into the video, an adult male removes her panties exposing her vaginal area. There is a close up at approximately 1:27. At 1:45 The adult males rubs the prepubescent female’s vagina with his index finger and thumb. Beginning at approximately 6:43, the adult male begins licking the prepubescent female’s vagina. This lasts until approximately 8:01. At approximately 13:05 the adult male rubs his penis against the prepubescent female’s vagina and inserts his penis into the vagina at approximately 22:24. At approximately 43:32, the camera angle changes to show the adult male facing the camera, visible below the neck, on top of the prepubescent female as he continues to vaginally penetrate her. The female does not move or react the entire time and remains motionless for the entire video. She appears to be Asian and approximately 6-8 years old. This video file was downloaded by law enforcement during a session</p>

	lasting between 20:03 and 20:19 on September 20, 2020.
1 (followed by Japanese characters) Hash Value: 760a0e0a7c93e1e512c360428e8a9db7	This video is 19 seconds in length and depicts a male vaginally penetrating a prepubescent Asian female. The prepubescent female is lying on her back on a white bed. She is naked and visible from her head to the bottom of her torso. Her legs are spread to the side exposing her genital area. Only the stomach and erect penis of the adult male are visible. This video file was downloaded by law enforcement during a session lasting between 13:22 and 14:24 on November 12, 2020.
FyRymW0sDOs.jpg Hash Value: 453e66cd55b0725332facccf59d27cfc	This image depicts a prepubescent female, approximately 5-7 years old posing with a red pencil inserted into her vagina. She is visible from her navel to her mid-thigh. Both of her hands are placed close to her vaginal area. The yellow sleeve is visible on her left arm. This video file was downloaded by law enforcement during a session lasting between 15:09 and 18:07 on November 22, 2020.

5. IP Address 1 was assigned, at the approximate times of the 2020 Session, to an account registered to defendant MANASSE's residence.

6. On or about April 20, 2021, law enforcement executed a search warrant at MANASSE's residence in Somerville, New Jersey. During the search of the residence, law enforcement asked MANASSE if anyone else lived in the residence with him. MANASSE responded that, in sum and substance, that he lived by himself at the residence.

7. During the search of the residence, law enforcement seized a computer tower from the residence. A forensic review of the computer tower seized from MANASSE's residence revealed approximately 25 LNK files containing file names suggestive of child sexual abuse material. A LNK file is a shortcut used by a computer's operating system as a reference to the original

file. A LNK file is typically created by a computer's operating system automatically when a user opens that file.

8. The presence of LNK files in MANASSE's computer tower indicates that those files were accessed on MANASSE's computer. Further investigation by law enforcement revealed that approximately 18 of the recovered 25 LNK files from MANASSE's computer matched the names of the files that were made available on the P2P Program by the Computer under IP Address 1 during the 2020 Session.

9. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography files described in paragraph 4, traveled 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, that is, the images were downloaded from and transmitted via the Internet.