
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III
 : :
 : Mag. No. 22-12075
 : :
ANSELMO GIRIMONTE : **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.

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

March 3, 2022
Date

at Essex County, New Jersey
County and State

Honorable James B. Clark, III
United States Magistrate Judge
Name and Title of Judicial Officer

/s/ James B. Clark
Signature of Judicial Officer

ATTACHMENT A

Count 1 – Distribution of Child Pornography

From on or about December 27, 2021 through on or about January 17, 2022, in Morris County, in the District of New Jersey, and elsewhere, the defendant,

ANSELMO GIRIMONTE

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.

1. At all times relevant to this Complaint, defendant Anselmo Girimonte (“GIRIMONTE”) was a resident of Wharton, New Jersey.

2. From on or about December 27, 2021 through on or about January 17, 2022, law enforcement conducted undercover online sessions (the “2021/2022 Sessions”) 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.

3. 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 worldwide 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.

4. 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.

5. During the 2021/2022 Sessions, 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 hash values that were identified to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the 2021/2022 Sessions 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.

6. During the 2021/2022 Sessions, law enforcement downloaded nine (9) video files 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:

FILE HASH VALUE	DESCRIPTION
705BA4B1D6F8672F2F516333A352C69 5	<p>This video, which is 16:25 in length, depicts an adult male engaged in sex acts with two prepubescent females. The video begins with a naked prepubescent female laying on her back holding her legs against her chest as a naked adult male anally penetrates her with his erect penis.</p> <p>The adult male begins to masturbate and then he begins to press his penis against the anus on the prepubescent female. The action continues to alternate between the male rubbing his erect penis against the female's anus and masturbating.</p> <p>Next, the adult male begins to lick the genital area of a second prepubescent female that had been laying on the same bed. Both prepubescent females are naked except for white socks. The male rubs his penis against the genitals of the second girl and then, he resumes licking her genital area. Thereafter, the male engages in anal intercourse with the second prepubescent female. This continues for the remainder of the video.</p> <p>This video file was downloaded by law enforcement during a session lasting between 03:43 AM and 05:08 AM on December 27, 2021.</p>

FILE HASH VALUE	DESCRIPTION
6BCC299342236A1F09A12FE8DECCB7E	<p>This video is 1:37 in length and depicts an adult male vaginally penetrating a prepubescent female. The video begins with a tight closeup of the face of a prepubescent female before shifting to a closeup of an adult male vaginally penetrating the female with his erect penis.</p> <p>The intercourse continues until the adult male removes his penis and begins to masturbate close to the face of the prepubescent female who is laying on her back. The male then ejaculates onto the face and lips of the female and rubs his semen onto the girl's mouth with his fingers.</p> <p>This video file was downloaded by law enforcement during a session that occurred 1:35 PM on December 27, 2021.</p>
9C2C2A91927E4D5B926A9D1950A8CB CB	<p>This video is 3:24 in length and depicts a prepubescent female engaged in sexual acts with an adult male. The video begins with a prepubescent female on her knees, facing the camera, wearing a gray short sleeve t-shirt with blue sleeves. The video alternates between the prepubescent female performing oral sex on the adult male and rubbing his penis with her right hand.</p> <p>Next, the female stands up. She is naked below the waist and her shirt has the picture of the face of a cartoon bee. The adult male begins to rub his erect penis against the vagina of the prepubescent female before partially inserting it. The male then pulls up the female's shirt. Thereafter, the female rubs the penis of the adult male and this continues for the remainder of the video.</p> <p>This video file was downloaded by law enforcement during a session that occurred at 1:17 AM on December 27, 2021.</p>

7. IP Address 1 was assigned, at the approximate times of the 2021/2022 Sessions, to an account registered to defendant GIRIMONTE's residence.

8. On or about March 2, 2022, law enforcement executed a search warrant at GIRIMONTE's residence in Wharton, New Jersey.

9. During the search of the residence, law enforcement seized, among other things, a Samsung Galaxy S5 cell phone with a cracked screen. The phone was found on the floor between a hamper and a closet in a bedroom. Law enforcement observed male clothing and shoes in both the bedroom and in a closet in the bedroom. GIRIMONTE stated, in substance and in part, that he slept alone in that bedroom.

10. On or about March 3, 2022, GIRIMONTE contacted me by telephone, asking about the status of the seized items. During that call, he stated, in substance and in part, that the Samsung Galaxy S5 phone belonged to him.

11. A forensic review of the Samsung Galaxy S5 phone seized from GIRIMONTE's residence revealed approximately sixty-two (62) video files that appeared to depict child pornography. The forensic review also revealed that two (2) email accounts associated with GIRIMONTE were linked to the phone.

12. Further investigation by law enforcement revealed that approximately four (4) of the recovered video files from GIRIMONTE's Samsung Galaxy S5 phone matched files previously downloaded by law enforcement from IP Address 1 during the 2021/2022 Sessions.

13. 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 6, 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.