

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

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Crim. No. 23-
v.	:	
	:	18 U.S.C. §§ 2251(a), 2251(e),
	:	& 18 U.S.C. § 2
STEVEN BROOKS	:	
	:	18 U.S.C. § 2252A(a)(5)(B)
	:	& 18 U.S.C. § 2

**I N F O R M A T I O N**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**COUNT ONE**

(Production of Child Pornography)

In or around October 2019, in the District of New Jersey and elsewhere, the defendant,

**STEVEN BROOKS,**

did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is, Minor Victim-1, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction and transmitting a live visual depiction of such conduct knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer and the internet.

In violation of Title 18, United States Code, Sections 2251(a), 2251(e),  
and Section 2.

**COUNT TWO**  
(Possession of Child Pornography)

In or around February 2021, in the District of New Jersey and elsewhere,  
the defendant,

**STEVEN BROOKS,**

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and Section 2.

### **FORFEITURE ALLEGATION**

1. The allegations set forth above are realleged and incorporated herein by reference.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses alleged in this Information, the defendant, STEVEN BROOKS, shall forfeit to the United States all of his right, title and interest in the following:

(a) all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, and 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, shipped, or received in violation of Title 18, United States Code, Chapter 109A;

(b) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Information; and

(c) all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in this Indictment and all property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following property seized from a third party on or about January 28, 2021 and from the defendant on or about February 16, 2021:

(a) One Apple iMac laptop, Serial Number D25MX0NUF8J7;

(b) One Cannon Camcorder, Serial Number 932044110846;

(c) One White Xbox 1S, Serial Number 100835493116;

- (d) One silver Apple iPad, Serial Number GG7Z8EQSMF3N;
- (e) One Samsung Galaxy Tablet Elie, Serial Number R52H913GX3M;
- (f) Four SD Cards – two Transcend 8GB SD Cards; and two SanDisk SD Cards;
- (g) One red EMTEC Thumb Drive;
- (h) One black Staples Relay Thumb Drive;
- (i) One black Lexar 16GB Thumb Drive;
- (j) Four Panasonic Tapes;
- (k) One New York Rangers Thumb Drive;
- (l) One External Hard Drive, Serial Number WXP1AB853FY8;
- (m) One Insignia USB 3.0 Memory Card Reader and Thumb Drive;
- (n) One EMTEC Purple Thumb Drive;
- (o) One PNY 64GB SD Card;
- (p) One grey Apple iPhone, IMEI # 354388060671493;
- (q) WD MY Passport External Hard Drive, Serial Number WXW1EB74PH6X;
- (r) One dark grey Apple iPhone, Serial Number C39VL371JCL8; and
- (s) One Apple Mac Book Pro, Serial Number A1502EMC2875.

#### **SUBSTITUTE ASSETS PROVISION**

4. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;

- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253, to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.



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PHILIP R. SELLINGER  
United States Attorney

**CASE NUMBER: 23-**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**STEVEN BROOKS**

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**INFORMATION FOR**

**18 U.S.C. §§ 2251(a), 2251(e)**

**18 U.S.C. § 2252(A)(5)(B)**

**18 U.S.C. § 2**

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**PHILIP R. SELLINGER**

*UNITED STATES ATTORNEY*

*FOR THE DISTRICT OF NEW JERSEY*

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BENJAMIN LEVIN

*ASSISTANT U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

*973-645-2762*

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