### UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.

v. : Mag. No. 24-11062

. Wag. No. 24-11002

ABDUR-RAZZAAQ HENDERSON : CRIMINAL COMPLAINT

:

I, Elizabeth White, 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

#### SEE ATTACHMENT B

continued on the attached page and made a part hereof.

/s/ Elizabeth White (EJ)

Elizabeth White, Special Agent Federal Bureau of Investigation

Special Agent White attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

March 5, 2024

Date

at New Jersey
State

Honorable André M. Espinosa /s/ André M. Espinosa (EJ)

<u>United States Magistrate Judge</u>

Name and Title of Judicial Officer Signature of Judicial Officer

### **ATTACHMENT A**

### COUNT ONE (Production of Child Pornography)

In or around April 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

### ABDUR-RAZZAAQ HENDERSON,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer, and such visual depiction was actually transported or transmitted using a means and facility of interstate or foreign commerce, namely by computer.

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

# COUNT TWO (Production of Child Pornography)

In or around July 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

### ABDUR-RAZZAAQ HENDERSON,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer, and such visual depiction was actually transported or transmitted using a means and facility of interstate or foreign commerce, namely by computer.

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

# COUNT THREE (Possession of Child Pornography)

On or about March 5, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

### ABDUR-RAZZAAQ HENDERSON,

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, namely 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, namely by computer.

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

#### ATTACHMENT B

- I, Elizabeth White, am a Special Agent with the Federal Bureau of Investigation ("FBI"). 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 Abdur-Razzaaq Henderson ("HENDERSON") was a resident of East Orange, New Jersey.
- 2. In or around April 2023, law enforcement received a complaint that an individual had utilized a Newark-area phone number ending in 8040 (the "8040 Number") to engage a twelve-year-old female ("Minor Victim-1"), who was located outside of New Jersey, in a sexually explicit text message conversation in or around April 2023. During the conversation, the individual using the 8040 Number requested that Minor Victim-1 make sexually explicit videos and send them to him via text message. Minor Victim-1 complied with the requests and created videos depicting herself masturbating and exposing her bare buttocks, anus, and vagina, which she then sent to the 8040 Number via text message.
- 3. In or around July 2023, the individual using the 8040 Number engaged an eleven-year-old female ("Minor Victim-2"), who was located outside of New Jersey, in a sexually explicit text message conversation. During the conversation, the 8040 Number requested that Minor Victim-2 make sexually explicit videos and send them to him via text message. Minor Victim-2 complied with the requests and took videos of herself using an object to penetrate her anus and vagina, which she then sent to the 8040 Number via text message. The individual using the 8040 Number then asked Minor Victim-2 to bring her 7-month-old sibling into her room and asked: "What would u do to her."
- 4. The investigation revealed that HENDERSON is, in fact, the individual using the 8040 Number. For instance: the 8040 Number is subscribed to the East Orange residence that is listed on HENDERSON's New Jersey Driver's License and New Jersey Identification Card. Moreover, during the investigation, law enforcement received authorization to obtain location information for the 8040 Number. That location information showed that the 8040 Number was present at a number of locations where HENDERSON was also present. For instance: at several points in or around February 2024, the

8040 Number was with HENDERSON while he was surveilled at his East Orange residence; the 8040 Number was also present with HENDERSON while he worked overnight; and the 8040 Number was also present with HENDERSON while he flew from Newark to Atlanta on or about February 7 and back on or about February 11, 2024.

- 5. On or about March 5, 2024, the FBI executed a search warrant of HENDERSON's person and his East Orange residence. HENDERSON was found at his East Orange residence. The phone associated with the 8040 Number was also in the residence. After being advised of his *Miranda* rights, HENDERSON admitted that the phone associated with the 8040 Number was his and provided a passcode that successfully unlocked the phone. A lawful search of the phone associated with the 8040 Number revealed that the device contained multiple videos depicting child pornography. Descriptions of three of these videos are as follows:
  - a. **February 17, 2:14 p.m.**: This video depicts what appears to be a prepubescent male exposing his penis to the camera, touching his penis, and exposing his bare buttocks to the camera. The video is approximately 9 seconds in length.
  - b. **February 17, 2:20 p.m.**: This video depicts what appears to be prepulsecent male exposing his bare buttocks and anus to the camera. The video is approximately 5 seconds in length.
  - c. **February 17, 2:21 p.m.**: This video depicts what appears to be a prepulsecent male exposing his bare buttocks and anus to the camera. The video is approximately 32 seconds in length.
- 6. After being advised of his *Miranda* rights, on or about March 5, 2024, HENDERSON admitted engaging Minor Victim-1 and Minor Victim-2 in the above-referenced sexual conversations, requesting sexually explicit images and videos from them, and receiving those items.