

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Rukhsanah L. Singh, U.S.M.J.
v. : Magistrate. No. 25-14013
MARC PANCHENKO : **CRIMINAL COMPLAINT**

I, Jessica Norfleet, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

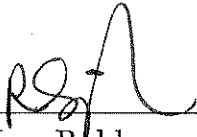
I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Jessica Norfleet
Jessica Norfleet, Special Agent
Federal Bureau of Investigation

Special Agent Norfleet attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 14th day of April, 2025.


Hon. Rukhsanah L. Singh
United States Magistrate Judge

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AT 8:30 M
CLERK, U.S. DISTRICT COURT - DNJ

ATTACHMENT A

On or about March 19, 2025, in the District of New Jersey and elsewhere, the defendant,

MARC PANCHENKO,

knowingly possessed and attempted to possess a Samsung Galaxy A14 G5 cellular telephone that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, 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)(5)(B).

ATTACHMENT B

I, Jessica Norfleet, am a Special Agent of the Federal Bureau of Investigation ("FBI"). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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. As part of federal supervision of defendant Marc Panchenko ("PANCHENKO") for a prior offense, following PANCHENKO's release from custody on or about November 2, 2023, United States Probation ("Probation") installed monitoring software on PANCHENKO's cellular telephone (the "Panchenko Phone") to detect any images of child pornography (as defined in 18 U.S.C. § 2256) and child exploitation (collectively referred to herein as Child Sexual Abuse Materials or "CSAM"). On or about March 3, 2025, the software alerted Probation to the existence of CSAM on the Panchenko Phone.

2. On or about March 19, 2025, in accordance with the terms of the federal supervised release, Probation asked PANCHENKO to bring the Panchenko Phone (as well as his laptop) to Probation's offices in Newark, New Jersey. Consistent with its legal authority and obligation, Probation used a tool to forensically extract the contents of the Panchenko Phone (the "Forensic Image").

3. On or about April 10, 2025, pursuant to authorization granted by the Court, the FBI obtained a copy of the Forensic Image. Further examination of the Forensic Image revealed that on or about March 19, 2025, the Panchenko Phone contained over 600 videos of varying length and over 12,000 digital photos, which appear to have been on a Secure Digital (or SD) card inserted into the Panchenko Phone. An ongoing review of these videos and images has revealed that some of them contain CSAM, including images depicting prepubescent minors engaged in sexually explicit conduct.

4. Summaries of three of these CSAM images include:

<u>Filename</u>	<u>Description</u>
Gostosa de calcinha e nua	This video is approximately 1 minute and 19 seconds long, depicting a prepubescent minor Caucasian female with dark hair, wearing red underpants and no shirt in a dimly lit room. In the background there are pink decorations and see through curtains in the room. She appears to be dancing/twerking with her buttocks up to the camera. She takes off her underpants and exposes her vagina. Then proceeds to turn around and display her anus and vagina to the camera. She pulls her underpants back up.
UNICO_3838934_uk_UA_4222102_❤_+_20200307_171153	The video is approximately 6 minutes and 34 seconds long, depicting a prepubescent Caucasian female with brown hair and a blue shirt. The female appears to be talking to someone or saying something throughout the video. The prepubescent female turns the camera around towards her vagina, pulls down her underwear to expose vagina, then turns the camera back towards herself to speak. The prepubescent female then turns the camera towards her vagina and pulls down her underwear to expose her vagina.
UNICO_3852165_uk_UA_4554058_мООП_делаюсигтныпиары_20200331_162829	The video is approximately 8 minutes and 11 seconds long, depicting a Caucasian pubescent female wearing a pink shirt with rainbow symbol on the shirt and pink pants. She appears to be speaking to the camera. The pubescent female goes into a home office with a brown desk in the background and brown cabinet in the room. The female pulls down her underwear exposing anus and vagina, and then pulls her buttocks apart with hands to expose her anus. She then uses her hands to pull her vagina open and exposes it to the camera.

5. Based on my education, training and experience, and my discussions with other law enforcement officers and witnesses, and to the best of my knowledge and belief, the images of child pornography found on the Panchenko Phone were transported and transmitted in interstate commerce and were transported and transmitted using any means and facility of interstate and foreign commerce, including by computer, and the images of child pornography found on the Cellphone

further were produced using materials that were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.