
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Jessica S. Allen
 :
 v. : Mag. No. 25-8109
 :
 KESHAWN HARLEY : **CRIMINAL COMPLAINT**

I, Brian Salamone, 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/ Brian Salamone

Special Agent Brian Salamone
Federal Bureau of Investigation

Special Agent Salamone attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 29th day of April, 2025.

HONORABLE JESSICA S. ALLEN
UNITED STATES MAGISTRATE JUDGE

/s/ Jessica S. Allen (LDK)

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Sex Trafficking of a Minor)

From in or around May 2022 through in or around April 2024, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

KESHAWN HARLEY,

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, Minor Victim-1, after having had a reasonable opportunity to observe Minor Victim-1, and in knowing and in reckless disregard of the fact that Minor Victim-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c).

COUNT TWO
(Production of Child Pornography)

From on or about January 19, 2024, through on or about February 2, 2024, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

KESHAWN HARLEY,

did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim-1, an individual who had not attained the age of 18 years, 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 any means and facility of interstate and foreign commerce and in and affecting interstate commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE
(Possession of Child Pornography)

Between on or about January 19, 2024, to June 18, 2024, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

KESHAWN HARLEY,

did knowingly possess material that contained 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, Section 2252A(a)(5)(B) and (b)(2).

ATTACHMENT B

I, Brian Salamone, am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2003. As such, I am involved in the investigation of child pornography and child exploitation offenses in New Jersey. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are relayed herein, they are relayed in substance and part. Because this Complaint 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:

- a. The Defendant, Keshawn Harley ("Harley"), was a resident of Paterson, New Jersey.
- b. Minor Victim-1 was born in or around July 2006.
- c. Minor Victim-2 was born in or around January 2006.

2. Beginning in or around May 2022, Minor Victim-1 and Minor Victim-2 began attending "after-hours" parties hosted by Harley at residences in Paterson, New Jersey. To enter, female guests were required to pay Harley a \$50 entry fee. Once inside, Minor Victim-1 and Minor Victim-2 were paid by men to dance and engage in sexual acts.

3. On or about June 19, 2024, law enforcement obtained Harley's electronic devices, including a cell phone, pursuant to a search warrant. Harley's phone contains a photo with a metadata date of December 23, 2022, which is a screenshot of a May 2022 news article regarding Minor Victim-1 and Minor Victim-2 being missing minors, including their photographs and ages.

4. Harley's phone also contains numerous communications indicating that Harley was arranging for Minor Victim-1 to engage in commercial sex work. For example:

- a. On or about May 21, 2023, Harley wrote another individual ("Individual-1"), "If you was here tonight, we wouldn't have had to go to work all week. I'm still in the Afterhour right now these girls are up to 3000 apiece. And I'm up . . . I came in here with \$35 on my cash app[.]" Harley then sent a screenshot of his CashApp account reflecting a total balance of \$4,483.22 and wrote, "All of this is off of just one customer . . . And all the money and the girls made."

We are still in here. He is spending money. I want it all.” Harley then sent Individual-1 a video of an unidentified man throwing money on Minor Victim-1. Harley’s phone also contains another video dated May 21, 2023, of Minor Victim-1 with her pants pulled down around her knees to expose her underwear, which were stuffed with dollar bills, with additional cash on the floor around her. The camera then panned to an unidentified man holding cash who stated, “You know what I need? I need a girl to eat her pussy right now. I am paying. Right now. 2 to 3 hundred let’s go.”

- b. On or about May 22, 2023, Harley texted Minor Victim-1, “I sent you \$30 too much. I was only sending you guys 145 because it cost money for me to transfer that to my cash app so you need to send me \$30 back[.]” Subpoena returns confirm that Harley paid Minor Victim-1 \$175 on or about May 22, 2023, and that Minor Victim-1 then sent \$30 back to Harley. Subpoena returns further indicate that Harley paid Minor Victim-1 \$70 on or about May 21, 2023.
 - c. On or about December 24, 2023, Harley texted Minor Victim-1, “Can u send me some pics[?]” Minor Victim-1 then sent two videos of herself, and Harley responded, “So I be making money off of her[.]”
 - d. On or about December 25, 2023, Harley texted Minor Victim-1, “I’m the only one that actually put money in your pocket and didn’t even fuck with you. Send you on dates put money in your pocket.” Minor Victim-1 responded, “But I only made 50\$ an it was [house fee,” and Harley replied, “Well like I said I wasn’t there. The last time I had you making money you made good bread or did you forget[?]”
 - e. On or about April 18, 2024, Harley communicated with a prospective customer (“Individual-2”) to arrange a date with Minor Victim-1. Individual-2 wrote, “Send me pic of the girl. Is she hot[?]” Harley sent an image of Minor Victim-1 and an unidentified female, and wrote, “I have these 2 for you[.]” Individual-2 responded, “Ok. Omg,” and Harley provided an address in Paterson. Individual-2 replied to the image of Minor Victim-1, writing, “get another like [her] and not the other. Get a Latina.”
5. Harley’s phone also contains child sexual abuse material (“CSAM”) of Minor Victim-1 performing sex acts on Harley. For example:
- a. On or about January 19, 2024, Harley texted Minor Victim-1, “What the addy[?]” Minor Victim-1 responded with an address in Paterson, and Harley responded with a screenshot and updates indicating that he was sending an Uber to pick her up. Minor Victim-1 then texted Harley, “I’m here.” Later that day, Harley received a video sent from

Minor Victim-1's phone, which depicted Harley having sex with Minor Victim-1. The video is filmed from Harley's perspective, and depicts Minor Victim-1, who is nude except for underwear, which was pulled to the side so Harley could penetrate her. The video also contains identifying tattoos of both Harley and Minor Victim-1.

- b. Harley's phone also contains a video, dated February 2, 2024, which was filmed from Harley's perspective and depicts Minor Victim-1 performing oral sex on Harley. Minor Victim-1's face is clearly shown in several portions of the video, and Harley was again identified by his tattoos.