UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.

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v. : Crim. No. 25-

:

NABEEN LEIGH SINGHA : 18 U.S.C. §§ 2251(a) and (e)

18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1) 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States charges:

COUNT ONE (Production of Child Pornography)

From in or around July 2021 through in or around March 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NABEEN LEIGH SINGHA,

did knowingly employ, use, persuade, induce, entice, and coerce any minor, namely Minor-1 and Minor-2, to engage in any sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any 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 mailed; and that visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

and that visual depiction was actually transported and transmitted using any means and facility of interstate or foreign commerce and mailed.

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

COUNT TWO (Receipt of Child Pornography)

From in or around July 2021 through in or around March 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NABEEN LEIGH SINGHA,

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, 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, Sections 2252A(a)(2)(A) and (b)(1).

<u>COUNT THREE</u> (Possession of Prepubescent Child Pornography)

On or about March 29, 2022, in Essex County, in the District of New Jersey and elsewhere, the defendant,

NABEEN LEIGH SINGHA,

did knowingly possess, and knowingly access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and any other material that contained images and videos of child pornography, as defined in Title 18, United States Code, Section 2256(8), including images involving a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, namely by computer.

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

FORFEITURE ALLEGATION

Upon conviction of any of the offenses in violation of Title 18, United States Code, Sections 2251(a), 2252A(a)(2)(A), and 2252A(a)(5)(B) as charged in this Information, the defendant,

NABEEN LEIGH SINGHA.

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2253, all right, title, and interest of the defendant in the following:

- (a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Part I, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Information, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property.

The property subject to forfeiture includes, but is not limited to, all right, title, and interest of the defendant in one Samsung Galaxy S21 Ultra 5G cell phone, bearing serial number R3CR50JY95N.

Substitute Assets Provision

If by any act or omission of the defendant any of the property subject to

forfeiture described above:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

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 divided

without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section

853(p), to seek forfeiture of any other property of the defendant up to the value of the

above-described forfeitable property.

TODD BLANCHE

U.S. Deputy Attorney General

Philip W. Lamparello / bah

ake A. Nasar

PHILIP LAMPARELLO

Senior Counsel

JAKE A. NASAR

Assistant U.S. Attorney

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