

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

UNITED STATES OF AMERICA : Hon. Katharine S. Hayden
: :
v. : Crim. No. 26-cr-35
: :
ABDUR-RAZZAAQ HENDERSON : 18 U.S.C. §§ 2251(a) and (e)
: : 18 U.S.C. § 2252A(a)(5)(B)

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's Office for the District of New Jersey charges:

COUNT 1
(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 a minor – Victim-1 – 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 2
(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 a minor – Victim-2 – 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 3
(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), including images involving a prepubescent minor and a minor who had not attained 12 years of age, 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) and (b)(2).

FORFEITURE ALLEGATION

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

ABDUR-RAZZAAQ HENDERSON,

shall forfeit to the United States, pursuant to Title 18, 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.

2. The property subject to forfeiture includes, but is not limited to:

- a. one Apple iPad Air MM713LL/A serial LF2V6H9FJQ;
- b. one dark blue Apple iPhone, cracked back;

- c. one Apple MacBook A2179 FCCID BCGA2179 serial FVFD8032M6KH;
- d. one black Thinkpad with stickers, serial SL10M37875;
- e. one gray Apple iPhone, cracked back; and
- f. one Apple iPhone with black cover, serial LQ3PG7XFDK.

Substitute Assets Provision

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 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 subdivided without difficulty,

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

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U.S. Deputy Attorney General

PHILIP LAMPARELLO
Senior Counsel

/s/ Eli Jacobs
Eli Jacobs
Assistant U.S. Attorney

Approved:


Bradley A. Harsch
Chief, Criminal Division

CASE NUMBER: 26

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

UNITED STATES OF AMERICA

v.

ABDUR-RAZZAAQ HENDERSON

INFORMATION FOR

**18 U.S.C. §§ 2251(a) and (e)
18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)**

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