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

UNITED STATES OF AMERICA : Hon. Jose R. Almonte
 : :
 : Mag. No. 22-16037
 : :
JONATHAN LATTIF : **CRIMINAL COMPLAINT**
 : :
 : :

I, Jill C. Lasseter 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 of the Department of Homeland Security Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

JILL C. LASSETER,
Special Agent
Homeland Security Investigations

Sworn to before me, and
subscribed in my presence

May 12, 2022 at
Newark, New Jersey

HONORABLE JOSE R. ALMONTE
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

(Possession of Child Pornography)

On or about March 18, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant

JONATHAN LATTIF

did knowingly possess material containing at least three images of child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, after having previously been convicted, in New Jersey Superior Court, of endangering the welfare of a child/knowingly possessing/viewing items of child exploitation or abuse of a child, in violation of N.J.S.A. 2C:24-4B(5)(b).

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

ATTACHMENT B

I, Jill C. Lasseter, am a Special Agent with the United States Department of Homeland Security- Homeland Security Investigations. I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. I have knowledge of the following facts. Because this Criminal Complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part and all dates and figures are approximate.

The Defendant and Relevant Entities:

1. At all times relevant to this Complaint:
 - a. Defendant Jonathan Lattif (“LATTIF”), was a resident of Jersey City New Jersey.
 - b. Newark Liberty International Airport (“Newark Airport”), was an international airport located in Newark, New Jersey.
 - c. United States Customs and Border Protection (“CBP”), was a branch of the Department of Homeland Security with offices in, among other locations, Newark Airport.

The Activities Relating to Material Constituting or Containing Child Pornography:

2. On or about March 14, 2022, LATTIF flew from the United States to Montego Bay, Jamaica.
3. On or about March 18, 2022, LATTIF returned to the United States on an international flight to Newark Airport, where CPB conducted a lawful boarder inspection of LATTIF and his iPhone SE (“LATTIF’s iPhone”).
4. A lawful search of LATTIF’s iPhone beginning in or around March 21, 2022, revealed that the phone contained several videos of child pornography, including:
 - a. *(pthc) daddy's girl - 12y sweety ptsc, pt, hussyfan, liluplanet, r(2).mpg*: A video which depicts a female minor, approximately 11 to 13 years old filmed with an adult male, where the female minor is seen performing fellatio on the adult male.
 - b. *Pigesl.wmv*: A video which depicts an adult female with a female toddler, where the adult female is seen performing cunnilingus on the female toddler.
 - c. *Lizhet_podruzhke.wmv*: A video which depicts two female minors, approximately 11 to 13 years old. The two minors are filmed performing cunnilingus on each other.
5. At the time of possession, LATTIF had at least one prior conviction, from in or around 2018, under state law relating to the possession of child pornography.