
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Jessica S. Allen, U.S.M.J.
	:	
v.	:	Mag. No. 22-8171
	:	
IGOR MICHAEL TERRERO	:	CRIMINAL COMPLAINT
	:	
	:	

I, Bradley J. Benwell, 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 United States Department of Homeland Security, Homeland Security Investigations ("HSI"), assigned to the Special Agent in Charge in the District of New Jersey, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Bradley J. Benwell, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Special Agent Benwell attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

<u>May 23, 2022</u> Date	in	<u>the District of New Jersey</u> County and State
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<u>Honorable Jessica S. Allen</u> <u>United States Magistrate Judge</u> Name and Title of Judicial Officer	 Signature of Judicial Officer
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ATTACHMENT A

Count 1 – Distribution of Child Pornography

From on or about August 30, 2021 through on or about April 20, 2022, in Morris County, in the District of New Jersey, and elsewhere, the defendant,

IGOR MICHAEL TERRERO

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

ATTACHMENT B

I, Bradley J. Benwell, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit 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.

Background

1. At all times relevant to this Complaint, Defendant Igor Michael Terrero (“TERRERO”) was a resident of Succasunna, New Jersey.

The Investigation

2. From on or about August 30, 2021 through on or about April 20, 2022, law enforcement conducted an undercover online session (the “2021/2022 Sessions”) using a publicly available peer-to-peer (“P2P”) software application program (the “P2P Program”). P2P is a method of communication available to Internet users through the use of special software. The software is designed to allow users to trade digital files through a worldwide network that is formed by linking computers together. Generally, when P2P software is installed on a computer, the user is directed to specify a “shared” folder. All files placed in that user’s “shared” folder are available to anyone on the worldwide network for download. A person interested in sharing child pornography with others in the P2P network need only place those files in his or her “shared” folders. Those child pornography files are then available to all users of the P2P network for download regardless of their physical location. The computers that are linked together to form the P2P network are located throughout the world; therefore, the P2P network operates in interstate and foreign commerce.

3. The P2P Program allowed users to connect to and share, search and download content. The version used by law enforcement allows law enforcement to determine the IP address through which target computers access the Internet.

4. During the 2021/2022 Sessions, a computer user shared multiple files of child pornography using the P2P Program from a certain IP address (the “Target IP Address”). The undercover law enforcement officer established a direct connection to the Target IP Address. Several of the files being shared by the Target IP Address had a hash value that has been identified to contain visual depictions of children engaged in sexual acts with adults. These files were shared during the 2021/2022 Sessions by a device using the Target IP Address. Video files and images of child pornography were

available from the Target IP Address, which other users accessing the P2P Network could download.

5. Indeed, during the 2021/2022 Sessions, more than 85 media files containing child pornography were available from the Target IP Address . The files included multiple visual depictions of pre-pubescent children engaged in sexual acts with adults, including the following representative sample:

FILE NAME	DESCRIPTION
File Name/Number: pthc !!! NEW Linda rides on a dick-9yo fucks like a pro.avi eD2k Hash Value: 73A5E47FD04E68D7705C CE700B25EEA6	This video, which is approximately 1 minute and 43 seconds in length, depicts an adult male lying on his back on a bed with blue sheets. The adult male, who is wearing nothing but socks, thus exposing his erect penis, is visible from his chest, which is in the foreground, to his feet. At the outset of the video clip, a prepubescent girl, who appears to be approximately 8-10 years in age, gets on top of the male's penis while facing away from the camera. She is entirely nude with the exception of a dark colored ski mask which covers her head. Her medium brown hair extends down from underneath the ski mask to the middle of her back. As the video proceeds, the adult male vaginally penetrates the prepubescent female. In the next segment, the prepubescent female reverses her position such that she is facing toward the camera while straddling the adult male albeit with only the back and bottom of the ski mask within the camera frame. The adult male continues to vaginally penetrate the prepubescent female through the end of the video clip. This video file was downloaded by law enforcement during a session lasting between 5:21 and 5:28 PM on September 19, 2021.

File Name/Number: 4Yr Fuck Little girl mpg !!! New!!! Brother Creams Baby Sister (pthc).mpg eD2k Hash Value: 9AC218E8F684AD0BEF7B1AD2D FOFF0B3	This video is approximately 5 minutes and 31 seconds in length and depicts an adult male performing sex acts on a prepubescent female. The video begins with a closeup of an adult male rubbing his penis with his right hand. The camera then pans to show a prepubescent female, naked from the waist down that appears to be approximately 3-5 years old, straddling his lap with her back facing the camera. The adult male continues to masturbate and rub his erect penis against the buttocks of the prepubescent female. At approximately 50 seconds into the video, the prepubescent female is turned around so that her vagina is visible. The male continues to masturbate and rub the female's vagina with his fingers and erect penis until approximately the 5:06 mark when he ejaculates onto the female's genital region. This video file was downloaded by law enforcement during a session lasting between 01:33 and 02:56 AM on December 30, 2021.
File Name/Number: PTHC pedoland Sdpa 10Yo Kim (Valya Sister or Friend) Child Porn Cumshot In Mouth Video 1 of 6 (By Kalel).avi eD2k Hash Value: 65AC2B35B2C0E56D1A71A7611F AAB4A9	This video is approximately 11 minutes and 10 seconds and depicts a prepubescent female engaged in oral sex with an adult male. The prepubescent female appears to be approximately 10-12 years of age. The video begins with a prepubescent seated in a wooden chair. She is wearing a sleeveless blue top and what appears to be opaque camouflage-colored goggles. At approximately 9 seconds into the video, an adult male enters the frame. He is wearing a blue shirt and is naked from the waist down holding his erect penis with his right hand. There is whip cream on the tip of his penis. The prepubescent female licks the whip cream of the erect penis. This action is repeated several times as the adult male squeezes whip cream out of its can onto his penis and the females places

	the entire penis in her mouth. At approximately 2:37 of the video, the scene changes to the prepubescent female dressed in a red multi-colored outfit with a polka dot skirt. She proceeds to undress in front of a wooden chair. She puts on a pair of black stockings and a black skirt. At approximately 7:10, the prepubescent female is seated in the chair with the same opaque goggles as before. She spends several minutes licking whip cream off the erect penis of an adult male and performing oral sex. The final 10 seconds of the video depict the adult male engaged in sexual intercourse with the female who is kneeling on the floor with her arms resting on a bed. This video file was downloaded by law enforcement during a session lasting between 08:00 and 08:17 AM on February 6, 2022.
File Name/Number: !!!finally fucked my shy daughter.mp4 eD2k Hash Value: 96BE9C4CA65B3847C7111CF6DEF6268A	This video file is 2 minutes and 18 seconds in length and depicts a prepubescent female engaged in sexual intercourse with an adult male. The video begins with a tight closeup of a penis of an adult man, wearing a condom, inserted into the vagina of a prepubescent female. The camera pans up to reveal the prepubescent female lying on her back, naked, on a bed with red sheets. The camera pans back down to a closeup of the continuing vaginal intercourse. At approximately 1:23 of the video, the prepubescent female re-inserts the erect penis of the adult male into her vagina. The remainder of the video depicts a closeup view of the ongoing vaginal penetration. This video file was downloaded by law enforcement during a session that occurred on April 20, 2022 at 6:50 AM.

6. Target IP Address was assigned, at the approximate times of the 2021/2022 Sessions, to an account registered to TERRERO's residence (the "Residence") in Succasunna, New Jersey.

7. On or about May 23, 2022, law enforcement executed a search warrant at the Residence.

8. During the search of the Residence, law enforcement seized, among other things, a desktop computer (the "Desktop Computer") located in the basement of the Residence, on which the P2P Program was present. After being advised of and waiving his *Miranda* rights in writing, TERRERO made a recorded statement. He told law enforcement, in sum and substance, that he downloaded the P2P program on the Desktop Computer and used the P2P Program on the Desktop Computer to download and view images and videos depicting child pornography¹.

9. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography files described in Paragraph 5, traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images and or videos were downloaded from and transmitted via the Internet.

¹ An initial forensic preview revealed videos depicting child pornography on the Desktop Computer. Forensic examination of the Desktop Computer and TERRERO electronic devices are ongoing.