AUSA: Matthew Specht

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MOHAMMAD HARUN RASHID,

Defendant.

COMPLAINT 26MJ4982

Violation of 18 U.S.C. § 2422(b)

COUNTY OF OFFENSE:
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

Cassidy Yotnakparian, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE
(Coercion and Enticement of a Minor)

1. On or about November 24, 2026, in the Southern District of New York and elsewhere, MOHAMMAD HARUN RASHID, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, RASHID, in communications over the internet and phone, agreed with an individual acting in an undercover capacity and posing as a 14-year-old girl to meet the 14-year-old girl in Orange County, New York for the purpose of engaging in sexual activities.

(Title 18, United States Code, Section 2422(b).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

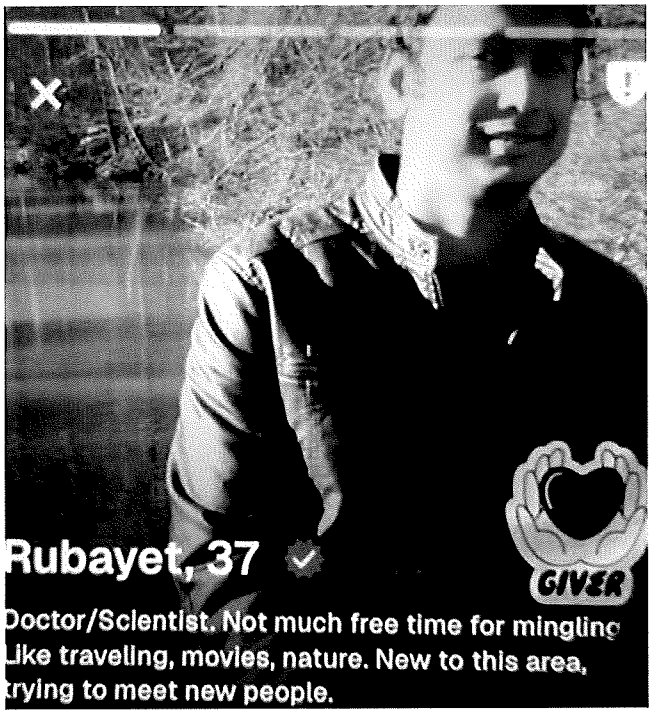
2. I have been a Special Agent with the FBI since in or about 2021. I have participated in numerous investigations involving crimes against children, including the receipt, possession, and/or distribution of child pornography by electronic means, sexual exploitation, and enticement of minors. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

3. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my participation in the investigation of this matter, my discussions with other law enforcement officers, and review of records from other law enforcement agencies, I have learned the following, in substance and in part:

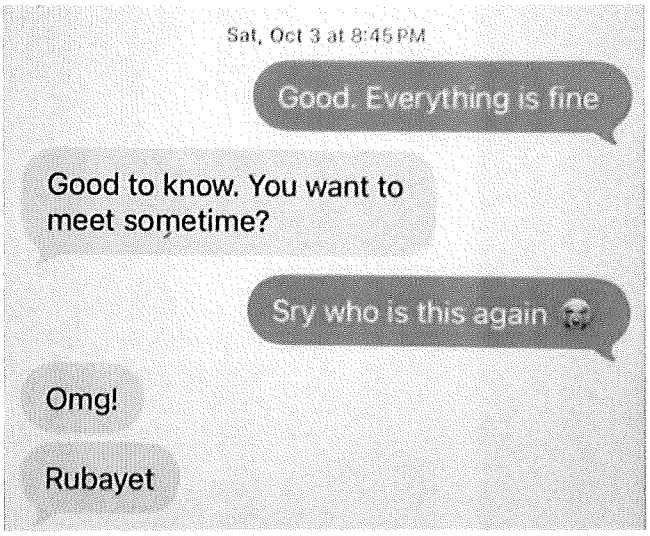
a. In or around August 2026, a profile ("Profile-1") was placed on an online dating application that is advertised as designed for facilitating casual sexual encounters ("Application-1").

b. Profile-1 was being operated by a law enforcement officer ("Officer-1") acting in an undercover capacity. Another user of Application-1 with the name Rubayet (depicted below) began corresponding with Profile-1:

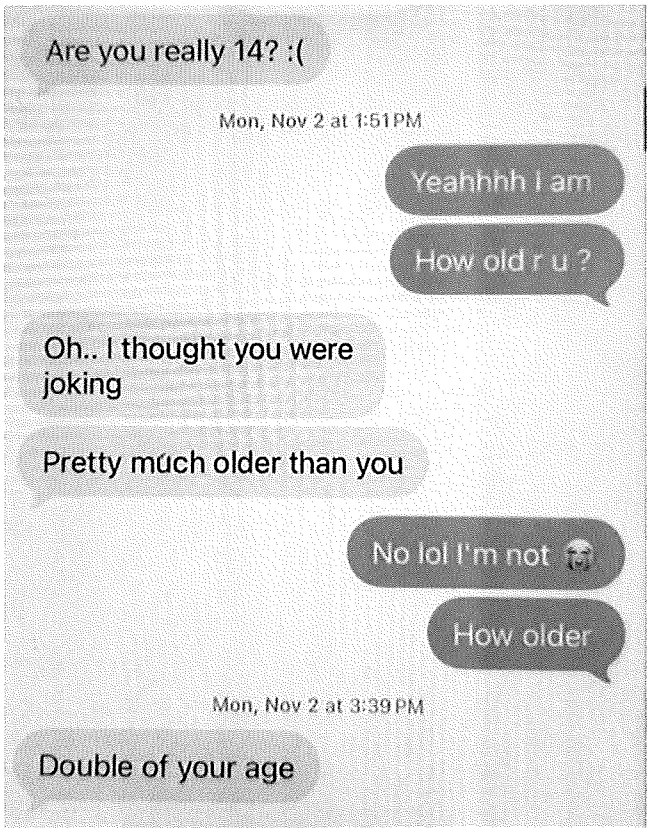


c. Officer-1 provided Rubayet with Officer-1's phone number. In or around October 2026, Officer-1 received a message from another phone number ("Phone Number-1"). The user of Phone Number-1 identified himself as Rubayet, as depicted below:[1]

[1] Officer-1's messages are visible on the right side of the exchange. Messages from Phone Number-1 are visible on the left side of the exchange.



d. The user of Phone Number-1 participated in the following exchange with Officer-1:



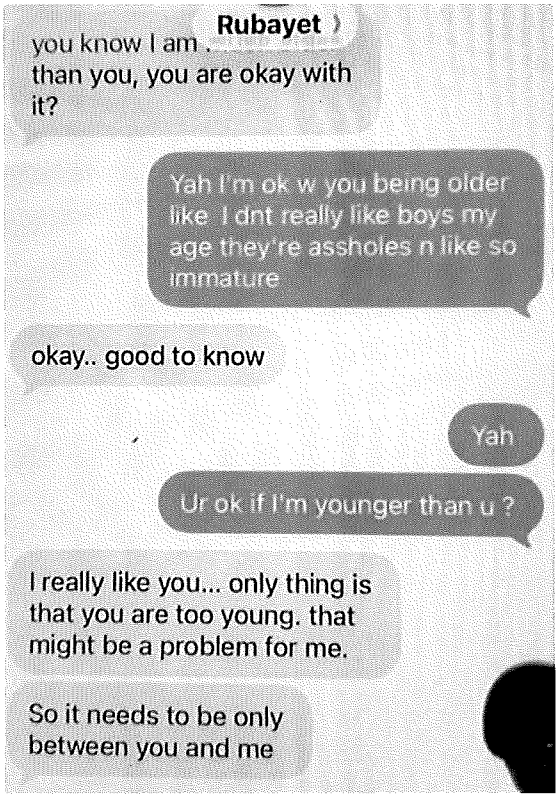
e. On or about November 17, 2026, Officer-1 wrote "Send me a pics of u !," and the user of Phone Number-1 responded by sending the following photo:



f. On or about November 17, 2026, the user of Phone Number-1 participated in the following exchange with Officer-1:



g. The user of Phone Number-1 and Officer-1 discussed meeting in person, as depicted below:


Rubayet
you know I am . than you, you are okay with it?
Yah I'm ok w you being older like I dnt really like boys my age they're assholes n like so immature
okay.. good to know
Yah
Ur ok if I'm younger than u ?
I really like you... only thing is that you are too young. that might be a problem for me.
So it needs to be only between you and me


Yah it will be like I'm not gonna tell ne1
I dnt want my mom to find out she wld kill me n like I wld loose my phone forever
because of your age, it'll be very inappropriate .
are you sure, I can trust you?
Oh ok yah I get it
Yah u can
Bc I dnt wanna get in trouble

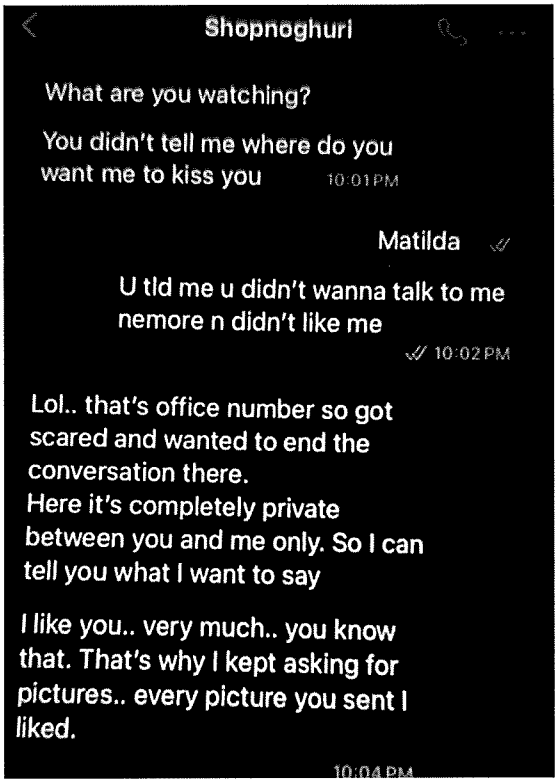

I can't ruin my career or your future legally
Like I wld get in soooooooo much trouble n be grounded 4 life literally
okay.. that's good.
Yah I dnt wanna ruin my future
I don't want that for you. You are such a sweet girl
Ur so nice to me
thanks a lot. I am little bit reserved because I am scared. If you make me feel safe without any problem,

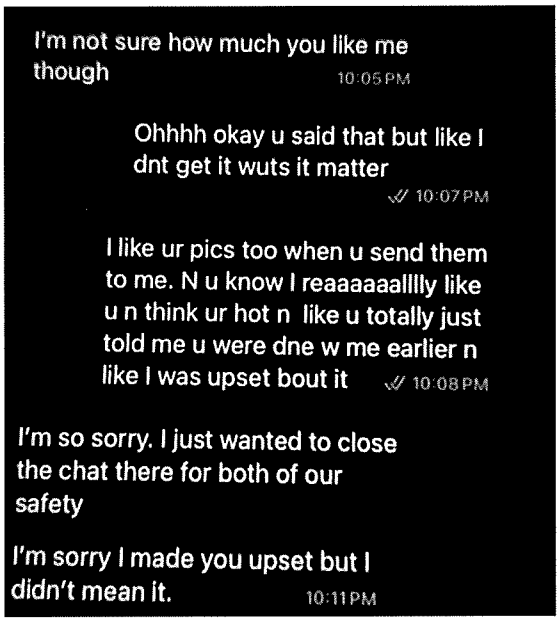
h. The user of Phone Number-1 asked Officer-1 to download a messaging application ("Application-2"), explaining "We can chat there, safer. I have never used it, we can try." The user of Phone Number-1 wrote, "But I think it's safer for our conversation if we want it to be private. I am just trying to make sure we don't get in trouble."

i. The user of Phone Number-1 wrote, "I am not sure if you are comfortable sending pictures without anything." Officer-1 responded, "Ooo u like mean completely nude." The user of Phone Number-1 wrote, "Hmm." The user of Phone Number-1 later wrote, "Did you download the app? Don't send me any pictures. I think it's not appropriate. We shouldn't send any personal or private pictures anyway. I think we're done. I don't want any trouble for you or me. I am so sorry. I actually thought you were older than you said. So I can't do that."

j. In or around November 2026, Officer-1 received a message from another phone number ("Phone Number-2"). The user of Phone Number-2 provided a link to Application-2 and wrote, "Hey, it's me. Can you please download this app and we can chat here? This is my personal number. Other one is office number. So avoiding it." The user of Phone Number-2 wrote, "This is Rubayet."

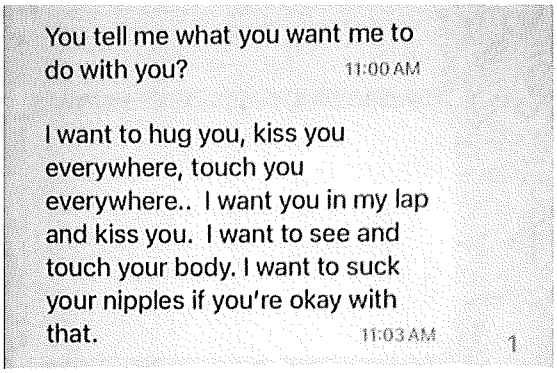
k. On or about November 19, 2026, Officer-1 received messages on Application-2 from user "Shopnoghuri" and participated in the following exchange:[2]

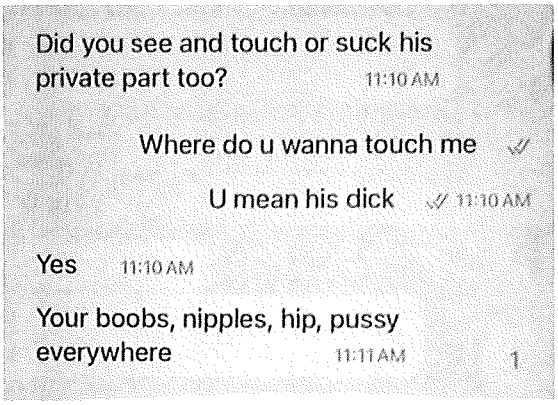




[2] Officer-1's messages are visible on the right side of the exchange. Shopnoghuri's messages are visible on the left side of the exchange.

l. On or about November 21, 2026, Shopnoghuri participated in the following exchange with Officer-1:





m. On or about November 21, 2026, Officer-1 wrote, in substance and in part, "Wut wld u do w my pussy." Shopnoghuri wrote, in substance and in part, "kiss.. touch.. little fingering. . . . I want you to kiss me passionately, touch, lick and suck my dick."

n. On or about November 21, 2026, Shopnoghuri asked Officer-1, in substance and in part, "Your mom works only on nights? How may days she works?" After Officer-1 provided the schedule, Shopnoghuri wrote, in substance and in part, "Let me know what days we can meet, better for me inf I know little ahead of time. Will be an hour drive for me. From next Monday my schedule will be pretty busy."

o. On or about November 21, 2026, Shopnoghuri sent Officer-1 the following photos:



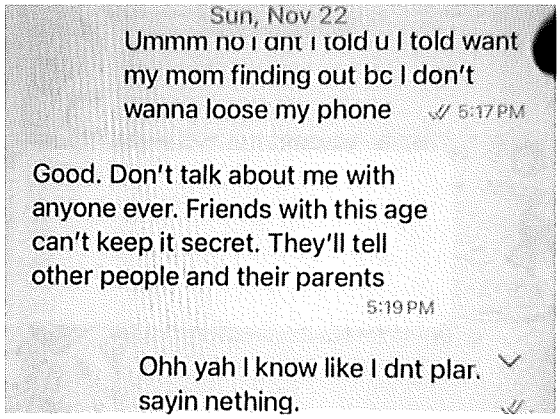


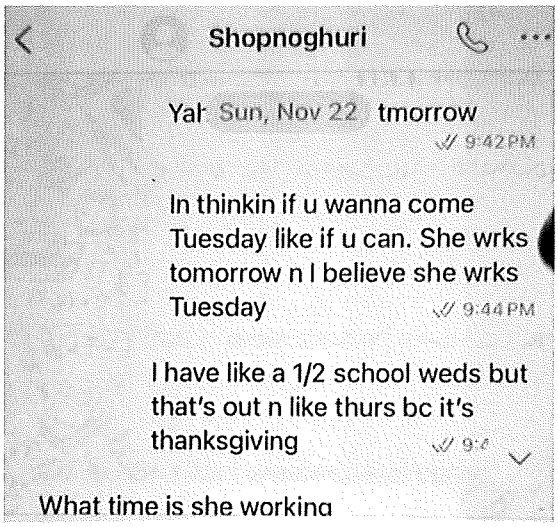
p. On or about November 22, 2026, Officer-1 and Shopnoghuri had the following exchange, in substance and in part:

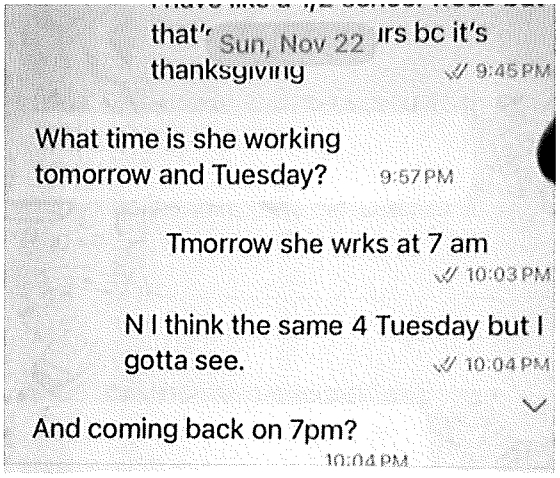
Officer-1:	Why did u ask me before if I ever had sex before.
Shopnoghuri:	Just to know how much experience did you have.
	Just to know if you know what it is.. lol.
	Why you didn't go all the way with him?
Officer-1:	Ohhh okay ummm yah I know what sex it lol u think I'm dumb
	Bc we just nvr done that before or tried.
Shopnoghuri:	Ok. You want to try?

q. On or about November 22, 2026, Officer-1 and Shopnoghuri had the following exchange:

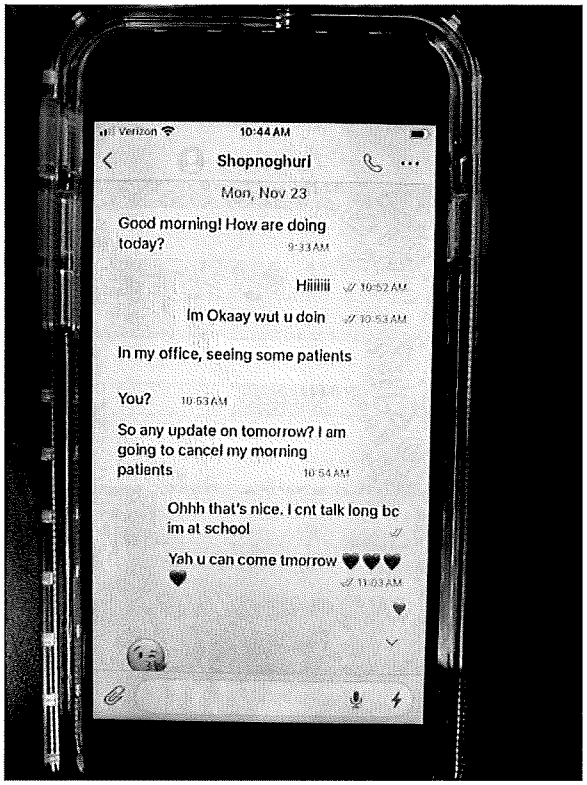


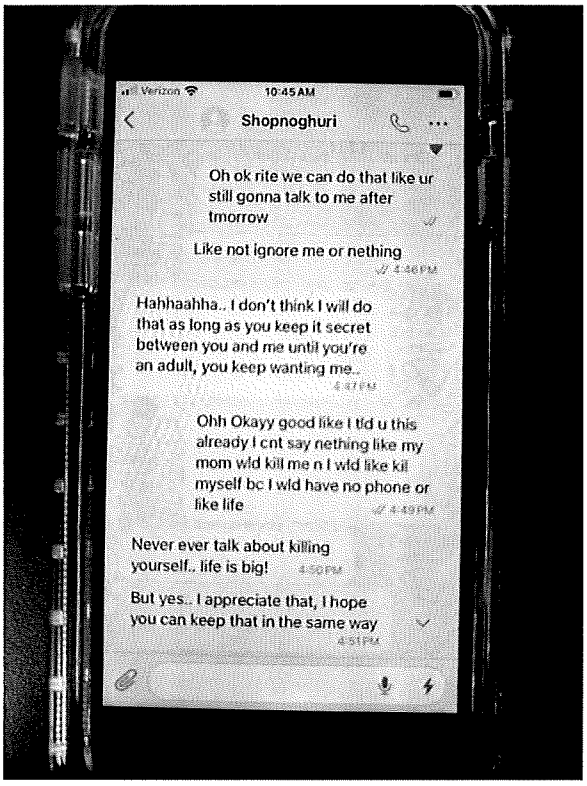


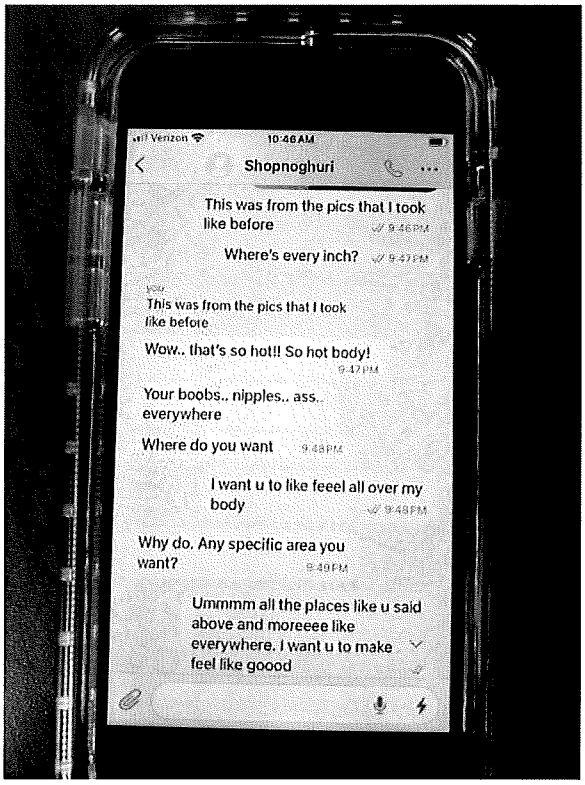


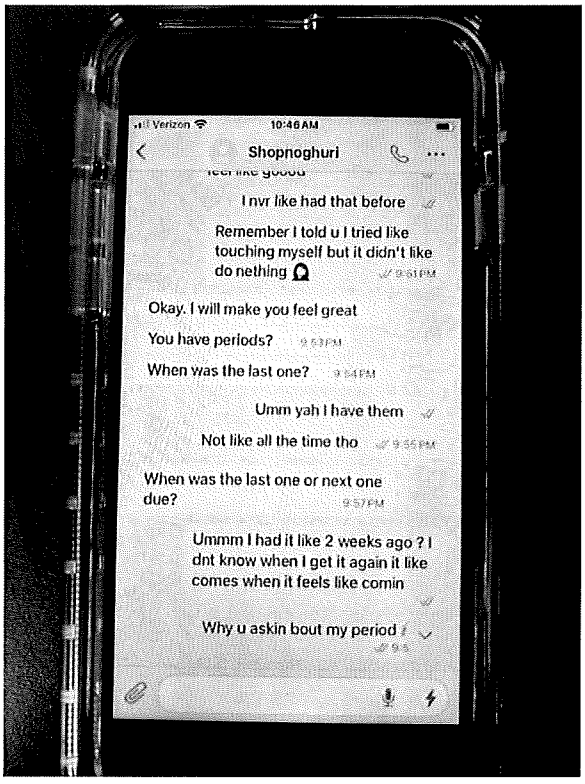


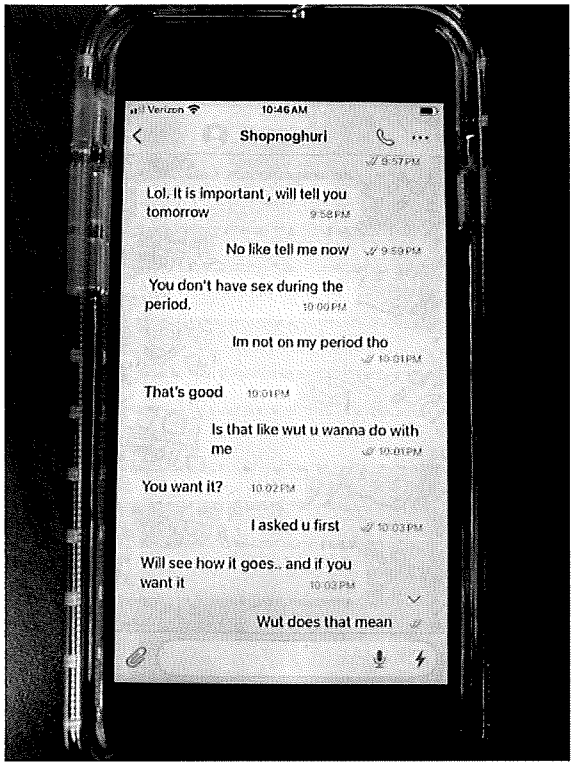
r. On or about November 23, 2026, Officer-1 and Shopnoghuri had the following exchange:

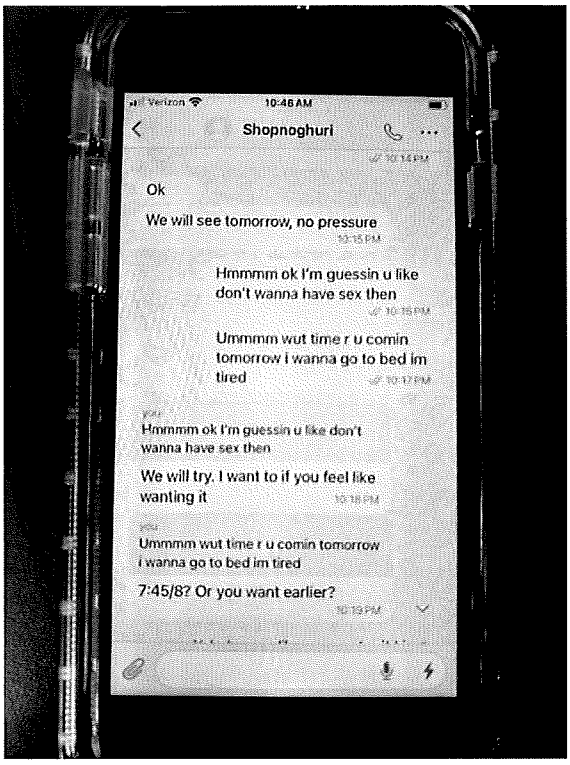


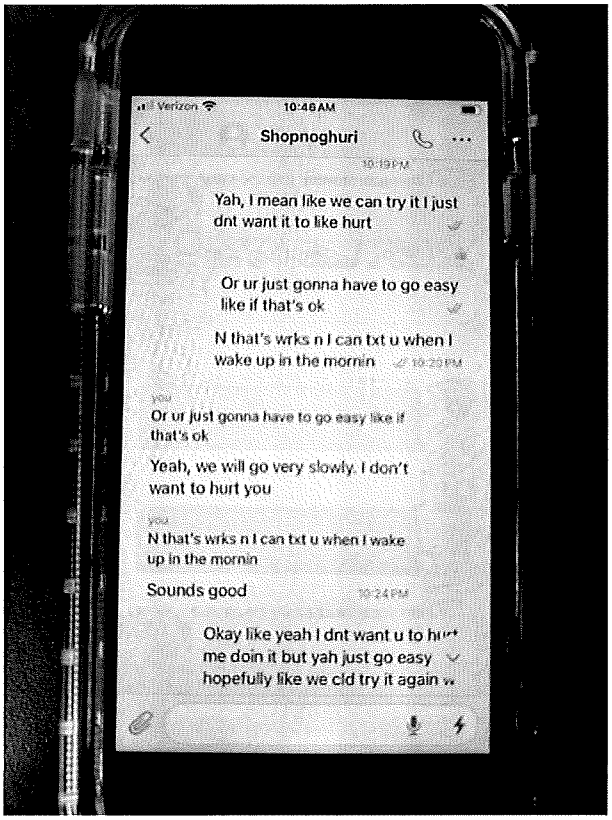







Verizon
10:46 AM
Shopnoghuri
Lol. It is important , will tell you tomorrow
No like tell me now
You don't have sex during the period.
Im not on my period tho
That's good
Is that like wut u wanna do with me
You want it?
I asked u first
Will see how it goes.. and if you want it
Wut does that mean


Verizon
10:46 AM
Shopnoghuri
Ok
We will see tomorrow, no pressure
Hmmmm ok I'm guessin u like don't wanna have sex then
Ummmm wut time r u comin tomorrow i wanna go to bed im tired
You
Hmmmm ok I'm guessin u like don't wanna have sex then
We will try. I want to if you feel like wanting it
You
Ummmm wut time r u comin tomorrow i wanna go to bed im tired
7:45/8? Or you want earlier?


Verizon
10:46 AM
Shopnoghuri
Yah, I mean like we can try it I just dnt want it to like hurt
Or ur just gonna have to go easy like if that's ok
N that's wrks n I can txt u when I wake up in the mornin
You
Or ur just gonna have to go easy like if that's ok
Yeah, we will go very slowly. I don't want to hurt you
You
N that's wrks n I can txt u when I wake up in the mornin
Sounds good
Okay like yeah I dnt want u to hurt me doin it but yah just go easy hopefully like we cld try it again

s. On or about November 23, 2026, Officer-1 provided Shopnoghuri an address in or around Orange County, New York. Shopnoghuri responded to Officer-1, confirming the location, in or around Middletown, New York. Officer-1 instructed Shopnoghuri, in substance and in part, to "park like in the back n ill give u my number when my mom leaves for wrk in the morning."

t. On or about the morning of November 24, 2026, law enforcement officers observed RASHID arrive at the parking lot of the address that Officer-1 provided to Shopnoghuri, and placed RASHID under arrest.

WHEREFORE, I respectfully request that MOHAMMAD HARUN RASHID, the defendant, be imprisoned or bailed, as the case may be.

CASSIDY YOTNAKPARIAN
Special Agent
Federal Bureau of Investigation

Sworn to before me on this
24th day of November, 2026

THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York