AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

FILED
11:54 am Nov 04 2025
Clerk U.S. District Court
Northern District of Ohio
Youngstown

United States of America
v.

Jeriah Mast

Defendant(s)

Case No. 4:25 MJ 6169

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the Northern District of Ohio, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 2423(c)	Engaging in Illicit Sexual Conduct in Foreign Places

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☑ Continued on the attached sheet.

Complainant's signature

Jason M. Guyton, Special Agent, FBI
Printed name and title

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1.

Date: November 4, 2025

Carmen Henderson
Judge's signature

City and state: Youngstown, Ohio

Carmen E. Henderson, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR AN ARREST WARRANT

I, Jason M. Guyton, being duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with Homeland Security Investigations (HSI), currently assigned to HSI Cleveland, Ohio. I have been employed with HSI since March 2009. As part of my duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation, including illicit sexual conduct in a foreign place, in violation of 18 U.S.C. § 2423(c), travel with intent to engage in illicit sexual conduct in a foreign place, in violation of 18 U.S.C. § 2423(b), sex trafficking, in violation of 18 U.S.C. § 1591, and the production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2251(a), 2252(a) and 2252A. I have received training in child exploitation investigations, taught child exploitation investigations to new agents at the HSI Academy, and have presented at multiple national and international conferences related to these investigations. I have written numerous affidavits in support of search and arrest warrants related to investigations of child pornography, online enticement, and other child exploitation crimes. Additionally, I have assisted other agents within HSI Cleveland and throughout the agency with investigations involving violations of 18 U.S.C. § 2423(c).

2. I am an "investigative or law enforcement officer" of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18, United States Code.

3. This affidavit is being submitted for the limited purpose of establishing probable cause that **Jeriah MAST**, age 44, who is currently residing at XXXXX Township Road 262, Millersburg, Ohio 44654 [redacted], in the Northern District of Ohio, Eastern Division, violated 18 U.S.C. § 2423(c) (eff. 4/30/03-7/26/06), Engaging in Illicit Sexual Conduct in Foreign Places.

4. The statements in this affidavit are based in part on information provided by other HSI agents and employees, local law enforcement, witnesses, my training and experience, and on my investigation of this matter. This affidavit includes only those facts that I believe are necessary to establish probable cause and does not include all the facts uncovered during the investigation.

STATUTORY AUTHORITY

5. As noted above, this investigation concerns alleged violations of the following:

a) Title 18, United States Code, Section 2423(c) (eff. 4/30/03-7/26/06), which prohibited a United States citizen from traveling in foreign commerce and engaging in any illicit sexual conduct with another person.

6. Title 18, United States Code, Section 3238, provides that "the trial of all offenses begun or committed upon the high seas, or elsewhere out of the jurisdiction of any particular State or district, shall be in the district in which the offender . . . is arrested or is first brought; but if such offender or offenders are not so arrested or brought into any district, an indictment or information may be filed in the district of the last known residence of the offender . . . , or if no such residence is known the indictment or information may be filed in the District of Columbia."

DEFINITIONS

7. The following definitions apply to this Affidavit:

a) "Commercial sex act," as defined in Title 18, United States Code, Section 1591(e)(3), is "any sex act, on account of which anything of value is given to or received by any person."

b) "Illicit sexual conduct," as defined in Title 18, United States Code, Section 2423(f) at the relevant time, is "(1) a sexual act (as defined in section 2246) with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States; or (2) any commercial sex act (as defined in section 1591) with a person under 18 years of age."

c) "Sexual act," as defined in Title 18, United States Code, Section 2246(2) at the relevant time, includes "contact between . . . the penis and the anus, . . . upon penetration, however slight"; "contact between the mouth and the penis"; and "the intentional touching, not through the clothing, of the genitalia of another person who has not attained the age of 16 years with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person."

PROBABLE CAUSE

8. In May 2019, HSI Cleveland received a tip-line complaint alleging that a U.S. citizen, Jeriah **MAST**, traveled from the United States to Haiti with a missionary organization and engaged in sexual activities with minors there. HSI learned from the Holmes County (Ohio) Sheriff's Office that **MAST** provided a voluntary interview to local law enforcement authorities on May 22, 2019, during which he admitted to molesting approximately 30 children in Haiti as well as 4 children in Ohio.

9. During the recorded interview with local authorities, **MAST** admitted, among other things, that since 2002 he had traveled between Haiti and the United States repeatedly, including with the organization Christian Aid Ministries ("CAM"). **MAST** stated that he first molested a child in Haiti in 2003 or 2004 and that he last molested a boy approximately 8 weeks prior (i.e., around March of 2019). **MAST** stated that he would touch the penises of his victims to arouse them and would often place his penis between his victims' legs and masturbate. **MAST** also stated that he sometimes gave money or other items to the children after sexually abusing them.

10. MAST, through his pastor, who had accompanied **MAST** to the interview with local authorities, provided a Holmes County detective with a list of 31 "Victims from Haiti," identified by name and/or description. The Holmes County detective shared this list with HSI, so that HSI could investigate the offenses committed in Haiti while Holmes County investigated the offenses committed in Holmes County.

11. On October 9, 2019, pursuant to a Holmes County plea agreement, **MAST** pleaded guilty to two counts of Third-Degree Gross Sexual Imposition, arising from his conduct with two different minors in Ohio.

12. In July of 2020, an HSI Forensic Interview Specialist separately interviewed two individuals who had been identified by their first names on **MAST**'s "Victims from Haiti" list (referred to hereafter as "MINOR 1" and "MINOR 4").

13. MINOR 1 reported **MAST** had sexually abused him in Haiti in 2004, when MINOR 1 was 13 years old. MINOR 1 explained he met **MAST** through **MAST**'s missionary work in Haiti, and he thereafter spent a night in a tent at the church with **MAST**. MINOR 1 woke to **MAST** getting closer to him and to MINOR 1's pants pulled down. **MAST** tried to put **MAST**'s

penis between MINOR 1's thighs and buttocks and to penetrate him. **MAST** used **MAST**'s hands to touch MINOR 1's penis and stomach. MINOR 1 ultimately left the tent.

14. MINOR 4 reported that **MAST** had sexually abused him while he was a minor in Haiti, including **MAST** rubbing his penis against MINOR 4 and **MAST** masturbating MINOR 4's penis over a sock.

15. HSI obtained foreign travel records showing **MAST** had taken over 30 flights from the United States to Haiti between November 2002 and August 2018. The records further showed, among other things, that **MAST** had been in Haiti in 2004, with a return flight from Port-au-Prince, Haiti, to Miami, Florida, in September 2004.

16. HSI obtained and reviewed a copy of **MAST**'s U.S. passport, issued on November 28, 2001. The passport lists **MAST**'s date of birth as XX-XX-1981 [redacted], and his place of birth as Ohio, U.S.A.

17. HSI reviewed MINOR 1's Haitian passport and birth certificate, showing he was born in the year 1991.

18. On or about October 27, 2025, HSI learned **MAST** had been released early on judicial release from the North Central Correctional Institution in Marion, Ohio, where he had been serving his state sentence since 2019, and that he is residing in Millersburg, Ohio (where **MAST** resided prior to being taken into custody for the state offenses described above).

19. On or about October 30, 2025, HSI received a copy of **MAST**'s Conditions of Community Control from Holmes County Adult Probation. The conditions include that **MAST** may not leave his residence overnight without permission from his probation officer and must

obtain a travel permit prior to leaving the State of Ohio. The starting date of the conditions is listed as October 14, 2025, and the ending date of the conditions is listed as October 14, 2028.

20. On October 31, 2025, Affiant spoke with Holmes County Sheriff's Office Detective Lieutenant Jim Henry regarding this investigation. Detective Henry contacted MAST's probation officer, who reported that **MAST**'s residential address is XXXXX Township Road 262, Millersburg, Ohio 44654 [redacted]. **MAST's** probation officer reported this is **MAST's** parents' residence and that he currently resides in the basement. Lastly, **MAST's** probation officer reported that **MAST** is not employed.

CONCLUSION

21. Based on the foregoing, there is probable cause to believe that **Jeriah MAST** violated 18 U.S.C. § 2423(c), Engaging in Illicit Sexual Conduct in Foreign Places.

Jason M. Guyton
Special Agent
Homeland Security Investigations

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 4.1; 41(d)(3) this 4th day of November, 2025.

Carmen Henderson
CARMEN E. HENDERSON
UNITED STATES MAGISTRATE JUDGE