

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
: :  
v. : Crim. No. 21-  
: :  
ANDREW CHU : 18 U.S.C. § 2252A(a)(5)

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 for the District of New Jersey charges:

From on or about February 14, 2018 through on or about February 25, 2018, in Union County, in the District of New Jersey, and elsewhere, defendant

ANDREW CHU

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.

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

## **FORFEITURE ALLEGATIONS**

1. The allegations set forth above are realleged and incorporated herein by reference.

2. Upon conviction of the violation of Title 18, United States Code, Section 2252A charged in this Information, defendant ANDREW CHU shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, all of his right, title, and interest in the following:

- a. Any visual depiction described in 18 U.S.C. §§ 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, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense set forth 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 the offense set forth in this Information, and any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following items:

- a. One (1) iPhone model A1549;
- b. One (1) Seagate external hard drive bearing serial number NA7GS4F1;
- c. One (1) MicroSD Kingston 4GB drive;
- d. One (1) HP Pavilion G6 laptop computer; and
- e. One (1) MacBook Air laptop bearing serial number DX1RX03XGMC3.

### **SUBSTITUTE ASSETS PROVISION**

4. 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 person;
- 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

  
RACHAEL A. HONIG  
Acting United States Attorney

CASE NUMBER: 21-

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

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**UNITED STATES OF AMERICA**

**v.**

**ANDREW CHU**

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**INFORMATION FOR**

**18 U.S.C. § 2252A(a)(5)**

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RACHAEL A. HONIG  
ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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