

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Christopher Au-Young

8:23-mj-00049-DUTY

Case No. **8:23MJ1036CPT**

Defendant(s)

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 August 2022 to present in the county of Hillsborough in the
Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2261A(1)(B)

Interstate Stalking

18 U.S.C. § 2261A(2)(B)

Cyberstalking

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.

Sworn to before me over the telephone or other reliable electronic means and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: JANUARY 12, 2023

Christopher P. Tuite
Judge's signature

City and state: Tampa, Florida

CHRISTOPHER P. TUIE, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, [REDACTED], being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2015. I am currently assigned to the Violent Crime Task Force of the FBI in the Middle District of Florida. During my time as a Special Agent with the FBI, I have participated in violent crime investigations as the primary investigator or in a subsidiary role. I am familiar with the procedures, activities, and investigative techniques associated with violent crime investigations, to include cases of online interstate threats and harassment, in violation of 18 U.S.C. §§ 875(c) and 2261A, and making obscene and harassing phone calls, in violation of 47 U.S.C. § 223(a)(1)(E). Prior to working with the FBI, I served as a police officer in Charleston, South Carolina, and an Assistant State Attorney in Orlando, Florida.

2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Christopher Au-Young ("AU-YOUNG"). This affidavit sets forth facts sufficient to establish probable cause to believe that AU-YOUNG has committed the violations of interstate stalking, 18 U.S.C. § 2261A(1)(B), and cyberstalking, 18 U.S.C. § 2261A(2)(B).

3. The facts contained in this affidavit are drawn from personal knowledge based on my participation in this investigation, information from other criminal investigators, information from law enforcement officers, information from agency reports, and the review of documents provided to me by witnesses and by law

enforcement officers. Because this affidavit is being submitted for the limited purpose of seeking authorization to arrest AU-YOUNG, I have not set forth each and every fact learned during the course of this investigation.

STATUTORY AUTHORITY

4. Title 18, United States Code, section 2261A(1)(B) prohibits a person from traveling in interstate or foreign commerce “with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel engages in conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to that person or an immediate family member of that person.”

5. Title 18, United States Code, section 2261A(2)(B) prohibits a person from acting “with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that causes, attempts to cause, or would reasonably be expected to cause substantial emotional distress to a person.”

PROBABLE CAUSE

Summary

6. Since in or around August of 2022, AU-YOUNG has engaged in a campaign of online and telephonic harassment and threats against Victim 1 and Victim

4. Victim 1 resides in the Middle District of Florida, and Victim 4 resides in Visalia, California. AU-YOUNG engaged in a course of conduct with the intent to harass or intimidate the victims. Specifically, AU-YOUNG cyberstalked, harassed, and threatened Victim 1 and Victim 4 by posting threatening and harassing videos on Facebook, YouTube, Vimeo and Reddit. AU-YOUNG also made repeated phone calls to and sent threatening voicemails and text messages to Victim 1 and Victim 4, which were transmitted in and affected interstate commerce. In the course of harassing Victim 1, AU-YOUNG traveled in interstate commerce to intimidate and harass Victim 2, who is an immediate family member of Victim 1. AU-YOUNG also harassed several other immediate family members of Victim 1, including Victim 3.

Victims 1 and 2

7. On or about January 3, 2023, the FBI interviewed Victim 1, who is an adult African American woman. Victim 1 provided the information below.

8. Victim 1 met AU-YOUNG in or around April 2022 and began a romantic relationship with him. Victim 1 ended the relationship with AU-YOUNG in or around August 2022. However, AU-YOUNG became enraged that Victim 1 broke up with him and started harassing and threatening Victim 1 and her family through email, text messages, social media (Facebook, YouTube, Reddit, and Vimeo), U.S. mail, and food delivery services such as Door Dash.

9. AU-YOUNG posted videos about Victim 1 on YouTube, Facebook, Reddit and Vimeo. The videos contained threats against Victim 1 and her family, as well as offensive and untrue allegations about Victim 1. Victim 1 told the FBI that AU-

YOUNG had posted approximately 50 videos about her. The videos were so offensive and threatening that many people complained and AU-YOUNG eventually removed most of them. Victim 1 tried to preserve some of the videos for evidence by taking screen captures of them. Victim 1 told FBI agents that in the videos, AU-YOUNG made statements such as, "I'm coming for you. I'm going to find you. Don't sleep at night. You're a cunt. You should die. How about I find your daughter and have fun with her too."

10. FBI agents received several clips of videos from YouTube Victim 1 had preserved. In the video clips, AU-YOUNG stated, "whatever time I have left on this pointless fucking planet I'm going to spend coming after you. I'm going to dismantle your life. I'm going to dismantle every part of your life."

11. FBI agents observed several videos posted on YouTube.com about Victim 1. The videos were between approximately 10 and 30 minutes in length and included offensive and racist rants about Victim 1, as well as false allegations that Victim 1 was a sex offender who had committed multiple acts of sexual assault on a minor. Some of the titles of these videos are listed below.

FUCK YOU [Victim 1's name] (UNEDITED)!!!!!!!!!!!!!!

[Victim 1's name] IS A FAT LOSER B*TCH

[Victim 1's name] USED TO LIVE IN HER CAR

[Victim 1's name]: SEX OFFENDER

[Victim 1's name] IS A HO, WHO*RE, SLU* JUST LIKE HER MOTHER

[Victim 1's name]: YET ANOTHER LOVELESS, BLACK WOMAN WHO
CAN'T FIND LOVE

FUCK YOU [Victim 1's name]

12. Victim 1 provided the FBI with a screenshot of a video that AU-YOUNG posted on YouTube. The screenshot did not include a date, but Victim 1 believed AU-YOUNG posted the video in or around August or September 2022. The screenshot displayed the captions generated by YouTube during the video. The captions read as follows:

"I'm still coming for you I swear to God I may not have your phone number I may not have your email or anything like that because you changed it or you got off social media all that stuff but I swear to God I swear on my [] grave I swear on the graves of my children I will come after you I promise that being said everyone have a nice day subscribe like comment all that stuff and peace out"

13. Victim 1 showed FBI agents screenshots of content AU-YOUNG had posted on his Facebook page on or about November 20, 2022. The screenshots displayed the following messages:

"I am going on a cross country road trip to tie up loose ends....I don't expect to come back afterwards though. This is it."

"I hope you unalive V, if you're not already fuckin unalive."

14. Victim 1 told FBI agents that Victim 3, who met AU-YOUNG after Victim 1, and shared similar experiences with AU-YOUNG, warned Victim 1 about AU-YOUNG's messages regarding travel to harm Victim 1. Victim 1 showed FBI agents screenshots of messages between Victim 1 and Victim 3. The screenshots, dated November 20, 2022, showed the following messages:

Victim 3: "He's said on Live he's travelling to you."

Victim 3: "He's travelling to tie up loose ends."

Victim 3: "Contact the authorities."

Victim 3: "He says he's bringing weapons."

Victim 3: "Sorry I didn't message you sooner."

15. Victim 1 told the FBI that her daughter (hereinafter "Victim 2") received harassing text messages from AU-YOUNG about Victim 1. Victim 1 showed FBI agents screenshots of messages Victim 2 received from AU-YOUNG. The messages have no date associated with them, but Victim 1 believed she received them in or around November 2022. The text messages came from an unknown phone number. Below are a few examples of the messages contained in the screenshots:

"Tell your mom that I'm going to be in town in New York in a couple of weeks!"

"I look forward to seeing her soon hahaha (wink emoji)"

"I'm gonna find out where she is"

"And when I do it's gonna be awesome, not for her but for ME it will hahaha"

16. Victim 1 told the FBI she tricked AU-YOUNG into thinking she lived in New York after she feared he would come to her residence in the Middle District of Florida.

17. In or around December 2022, AU-YOUNG posted multiple videos indicating he was going to track down and harm Victim 2. On or about December 10, 2022, AU-YOUNG drove from California to Illinois and showed up at a Victim 2's place of employment.

18. During his trip from California to Illinois, AU-YOUNG published videos on Facebook Live indicating that he was going to find Victim 2. Victim 2 received notification of the Facebook Live videos from Witness 1, who had viewed AU-YOUNG's videos online.

19. Victim 1 provided the FBI with screenshots of the messages from Witness 1 to Victim 2 warning her of AU-YOUNG's videos. FBI agents observed a Facebook message dated December 10, 2022, from Witness 1 to Victim 2. The message read,

"Hi I really need to contact you. Your mom's ex boyfriend is on his way to hurt you right now. https://youtu.be/RCUI3wpW_gs is a video he made being close to Carbondale. He has many other videos about how he is on his way to hurt you. <https://youtu.be/THZz088EIWM>"

20. FBI agents observed a Facebook message dated December 12, 2022, from Witness 1 to Victim 2. The message has a photo from inside a vehicle parked in the parking lot of Victim 2's place of employment. The message read,

"Girl this is NOT someone trying to troll you I am legit worried about you from this crazy son of a bitch. He is in the parking lot waiting on you he posted this pic."

21. Victim 1 told FBI agents that after she found out about AU-YOUNG's videos announcing his trip to Illinois, she contacted the local police, the FBI in Illinois, and employees at Victim 2's place of employment. Victim 1 told FBI agents that local law enforcement officers caught AU-YOUNG hiding in his vehicle in the parking lot before being able to hurt Victim 2.

22. FBI agents reviewed a police report from the Carbondale Police Department, which indicated that the police responded to Victim 2's place of

employment on or about December 13, 2022, and on or about December 14, 2022. According to the report, on or about December 14, 2022, Carbondale Police Department found AU-YOUNG in the back seat of his vehicle, parked in the parking lot where Victim 2 worked. AU-YOUNG told the police he was homeless and not doing anything wrong. The police then escorted AU-YOUNG off the premises.

23. Victim 1 told the FBI that AU-YOUNG called Victim 2's employer and said he had an interview with Victim 2. Victim 1 provided a screenshot of the below message from Victim 2 to Victim 1, dated December 12, 2022:

"He tried calling up here anonymous saying he had an interview with me that he'll be late.....My people lead saidddd uhhhhh"

24. After the above incident in Illinois, AU-YOUNG continued to post threatening videos and continued to attempt to locate Victim 1. In one video posted on or about December 27, 2022, AU-YOUNG posted a video offering to pay anyone \$4,000 for information on Victim 1's address. FBI agents observed this video still publicly available on YouTube.com. In the video, AU-YOUNG repeatedly asked for specific information about where Victim 1 was residing and offered \$4,000 to anyone who could successfully tell him where she lived.

25. Victim 1 also stated she received multiple harassing emails from AU-YOUNG between in or around August and December 2022. FBI agents reviewed screenshots of some of the emails Victim 1 received from AU-YOUNG. The screenshots did not include a specific date, but show the following messages:

"THAT'S EXACTLY WHAT YOU FUCKING ARE. A WHITE WORSHIPING HO. I HAVE BEEN CALLING YOU THAT ON HERE

FOR A BIT, AND YOU HAVE NEVER ONCE PROTESTED OR COMPLAINED ABOUT THAT. THAT'S WHY YOU DUMPED ME I BET! BECAUSE YOU WANTED WHITE COCK INSTEAD! I GUARANTEE IF SOME WHITE DUDE APPROACHED YOU ONLINE OR IN PERSON YOU WOULD SAY YES! BECAUSE YOU'RE A WHITE WORSHIPPING HO BAG!"

"AND FYI...I DID NOT GET MAD BECAUSE YOU WANTED TO BE LEFT ALONE. I GOT MAD BECAUSE YOU FUCKING DUMPED ME!!!!!!!!!"

"WHY DON'T YOU CRAWL BACK TO YOUR PSYCHO EX WHO HELD A KNIFE TO YOUR STOMACH...CLEARLY YOU TWO GET ALONG BECAUSE YOU'RE BOTH RETARDED ANIMALS WHO BELONG IN CAGES!!!"

26. Victim I told FBI agents the harassing and threatening emails she received came from email addresses cauyoung@asu.edu and jamiewu535@gmail.com.

27. The FBI subpoenaed Google LLC for subscriber information associated with the user of the account(s) that posted videos to YouTube as described in paragraph 13 of this affidavit, pursuant to an emergency disclosure request. On or about January 3, 2023, the FBI received subscriber records from Google. The records indicate the following:

Name:	SilverPictures77
Email:	cauyoung@asu.edu
Alternate Emails:	cauyoung@asu.edu , christopher.au-young@asu.edu , christopher.au-young@email.asu.edu
Account Recovery:	cauyoung@asu.edu
Last Login:	January 2, 2023
Name:	AMBW Love Original Content Channel
Email:	jamiewu55@gmail.com
Last Login:	January 2, 2023

28. Victim 1 told FBI agents that AU-YOUNG also harassed Victim 1 by phone. Victim 1 received approximately 20 to 30 voicemails from AU-YOUNG after breaking up with him. The content of the voicemails was similar to the videos AU-YOUNG had posted online and she recognized the voice in the voicemails as AU-YOUNGS. Victim 1 also said she received approximately two or three text messages every day from AU-YOUNG before she changed her phone number. The text messages came from different numbers, but the content in the text messages was similar to all of AU-YOUNG's harassing messages. Victim 1 received approximately 10 harassing phone calls per day. Victim 1 told FBI agents she received harassing calls from AU-YOUNG from nine different phone numbers and that she recognized the voice as AU-YOUNGS on the calls that she answered.

29. Victim 1 told FBI agents that her neighbors and family members received offensive mailings from AU-YOUNG. Victim 1 sent FBI agents photos of mail that Victim 1's son received from AU-YOUNG. The photos show the following written statements:

"[Victim 1's son's first name], SAY HI TO YOUR NIGGER FAMILY. YOUR NIGGER...YOUR NIGGER HALF-SISTER. TELL THEM I'M COMING FOR THEIR ASSESS. TELL YOUR NIGGER MOM THAT SHE'S A FUCKING NI..."

"ALSO, MADE ANOTHER VIDEO ABOUT YOUR MOM:
<https://www.youtube.com/watch...>"

Victim 3

30. On or about January 4, 2023, FBI agents interviewed Victim 1's brother (hereinafter "Victim 3"). Victim 3 told FBI agents that AU-YOUNG sent letters

threatening Victim 1 to his church. AU-YOUNG also posted a YouTube video about him, which he did not watch. Victim 3 received a recording device and a thumb drive in the mail. The contents of the recording device and thumb drive have not yet been reviewed. Victim 3 contacted the police after he started receiving mysterious Door Dash deliveries in or around September and October 2022. Victim 3 did not order the Door Dash deliveries although the deliveries specifically referenced Victim 3's name. In or around November 2022, strangers started knocking on Victim 3's door asking for him and his wife by name. Below is an excerpt from the letter sent to Victim 3's church:

"Minister [Victim 3's name]...tell your sister/sister in law, [Victim 1], that I'm coming for her and her children. These are not empty threats, I intend to carry them out...she WILL NEVER GET RID OF ME. I will never let her find peace or happiness, as long as I AM BREATHING!

Victim 4

31. FBI agents interviewed Victim 4 an African American adult female. Victim 4 told FBI Agents that AU-YOUNG contacted her on Facebook requesting to interview her about interracial dating. Victim 4 agreed and conducted an interview with AU-YOUNG on his YouTube channel AMBW (Asian Men Black Women). Victim 3 later went out on a date with AU-YOUNG but immediately noticed that something seemed off about him, so she attempted to end the relationship with him. However, after attempting to end the relationship, AU-YOUNG started harassing and stalking her.

32. AU-YOUNG posted four videos about Victim 4 on YouTube. The videos were offensive and degrading and published Victim 4's personal information

such as her residence, which she never gave to AU-YOUNG. Victim 4 received multiple calls per day from AU-YOUNG from various random phone numbers. When Victim 4 answered the phone, AU-YOUNG made threatening statements such as, "I'll be seeing you soon." Victim 4 recognized AU-YOUNG's voice in the calls. Victim 4 also received harassing and threatening voicemails and text messages. Victim 4 recognized the voice as AU-YOUNG's in the voicemails. The text messages Victim 4 received contained similar content to what was said in the posted videos, voicemails, and phone calls.

33. On at least three occasions in or around October and November 2022, AU-YOUNG arrived at Victim 4's home uninvited and unannounced. Victim 4 had been outside of her residence smoking a cigarette at approximately 3:00 a.m. and saw AU-YOUNG in his vehicle. As soon as she spotted him, he drove off. Victim 4 filed a police report documenting each of the three incidents and is in the process of seeking a protective order from AU-YOUNG (the injunction hearing is pending). Victim 4 has been forced to move to a new residence to hide from AU-YOUNG.

34. Victim 4 told FBI agents that AU-YOUNG created the AMBW (Asian Men Black Women) YouTube channel to victimize black women. Victim 4 told FBI agents that AU-YOUNG has stalked other African American women.

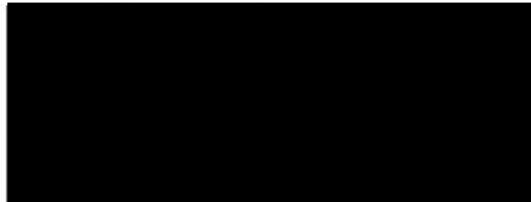
35. Additionally, Victim 4 told FBI agents she observed violent and disturbing videos on AU-YOUNG's YouTube channel. Specifically, Victim 4 observed AU-YOUNG stating that he is inspired by Dylan Roof because "the people had it coming." In his videos, AU-YOUNG bragged about having access to firearms.

AU-YOUNG said that he could take people out because he had access to drugs such as anesthesia because he knows a dentist.

36. Both Victim 1 and Victim 4 recognized AU-YOUNG in the aforementioned videos by face and voice because they have met him in person. In the communications that only contain audio, Victim 1 and Victim 4 recognize AU-YOUNG by his voice.

37. FBI agents identified AU-YOUNG in the videos by his California driver's license photo. The individual in the videos appear to be the same person.

38. Based on the facts presented in this affidavit, there is probable cause to believe that AU-YOUNG traveled in interstate commerce with the intent to intimidate and harass Victim 1 and Victim 4 and has used electronic communication services (to include YouTube, Facebook and, email and text message) to repeatedly communicate with the victims, and their associates, with the intent to harass and intimidate the victims. AU-YOUNG's conduct has caused substantial emotional distress to the victims. Additionally, AU-YOUNG knowingly utilized YouTube, Facebook, text message and email services to send true threats to injure Victim 1, with the intent to communicate the true threat.



Federal Bureau of Investigation

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) before me this 12 day of January, 2023.

A handwritten signature in blue ink that reads "Christopher P. Tuite".

HONORABLE CHRISTOPHER P. TUIITE
United States Magistrate Judge