

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. José R. Almonte
	:	
v.	:	Magistrate. No. 24-16095
	:	
JULIO ALBERY NUNEZ	:	CRIMINAL COMPLAINT

I, Elizabeth White, 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

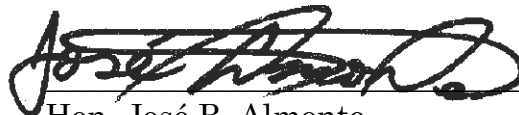
SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Elizabeth White

Elizabeth White, Special Agent
Federal Bureau of Investigation

Special Agent White attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 20th day of May, 2024.



Hon. José R. Almonte
United States Magistrate Judge

ATTACHMENT A

Count One
(Possession of Child Pornography)

On or about May 20, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIO ALBERY NUNEZ,

did knowingly possess material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were 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, 2252A(a)(5)(B) and (b)(2).

Count Two
(Production of Child Pornography)

From on or about November 3, 2023 through on or about November 13, 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIO ALBERY NUNEZ,

did employ, use, persuade, induce, entice, or coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, including by computer.

In violation of Title 18, United States Code, Section 2251(a) and (e).

ATTACHMENT B

I, Elizabeth White, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including business records, financial transaction records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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.

1. At all times relevant to this Criminal Complaint:
 - a. The Defendant, Julio Albery Nunez (“NUNEZ”), resided at a location in West New York, New Jersey (the “Residence”), which is located in Hudson County, New Jersey; and
 - b. Minor Victim-1 was approximately 15 to 16 years old and was physically located outside the District of New Jersey.
2. For background, since at least in or around December 2022, law enforcement officials have been investigating an individual known to distribute images of child sexual abuse material (“CSAM”) on various online and dark-web platforms, often with a specific moniker (the “Moniker”) attached to the content. Through investigation, law enforcement officials concluded that the individual sharing CSAM using the Moniker was NUNEZ.
3. From at least as early as on or about November 3, 2023, NUNEZ was in communication with Minor Victim-1 online. NUNEZ represented to Minor Victim-1 that he was a teenage girl and used a fake name to communicate with Minor Victim-1 on a cloud-based messaging application (the “Messaging Application”).
4. NUNEZ used an account on the Messaging Application (the “Messaging Account”) to: (1) communicate with Minor Victim-1; (2) send Minor Victim-1 videos of a young woman engaged in sexual acts; and (3) request that Minor Victim-1 engage in sexual acts, record them, and send them to NUNEZ’s Messaging Account. Minor Victim-1 complied with NUNEZ’s requests, and sent to NUNEZ:
 - a. a video that appears to depict Minor Victim-1, an approximately 15- to 16-year-old male, in a bathroom. Minor Victim-1 removes his clothing,

touches his penis, and, once completely nude, visibly displays his penis to the camera;

- b. a video that appears to depict Minor Victim-1, an approximately 15- to 16-year-old male, seated on the ground, exposing his anus to the camera and masturbating;
 - c. a video that appears to depict Minor Victim-1's penis urinating into a toilet;
 - d. a video that appears to depict Minor Victim-1 removing his underwear, exposing his anus and penis to the camera, and masturbating;
 - e. a video that appears to depict Minor Victim-1 laying on his back with his anus and erect penis exposed to the camera, masturbating and ejaculating; and
 - f. a video that appears to depict Minor Victim-1's erect penis urinating into a toilet bowl.
5. Further investigation also revealed that NUNEZ used a mobile payment service to send money to Minor Victim-1 in exchange for both CSAM and non-CSAM images of Minor Victim-1.
6. On or about May 20, 2024, law enforcement officials executed a lawfully obtained search warrant at the Residence. During the search of the Residence, law enforcement seized, among other things, at least two cellular phones, one laptop, and an external hard drive (collectively, the "Electronic Devices").
7. In a voluntary interview on or about the same date, NUNEZ stated to law enforcement officials, in sum and substance, that:
- a. he distributed CSAM on various online and dark-web platforms using the Moniker;
 - b. he was the sole owner and operator of the Messaging Account;
 - c. he was the sole owner and operator of the Electronic Devices;
 - d. he requested that Minor Victim-1 produce and then send to NUNEZ nude and other sexual content;
 - e. he understood Minor Victim-1 to be 15 to 16 years old at the time;

- f. he used a mobile payment service to send money to Minor Victim-1 in exchange for both CSAM and non-CSAM images of Minor Victim-1; and
 - g. that he communicated electronically with several other minors and requested and received sexual content from them, including one minor victim who ultimately committed suicide after NUNEZ shared some of the victim's content on the dark web.
- 8. A preliminary, on-scene review of the Electronic Devices revealed multiple images that appear to depict CSAM, including the videos described above in Paragraph 4.