
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. André M. Espinosa, U.S.M.J.
 :
 v. : Mag. No. 25-11031
 :
 JULIAN NOVA : **CRIMINAL COMPLAINT**
 :

I, Mallory Farrar, 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:

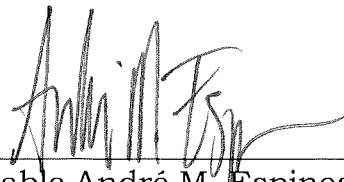
SEE ATTACHMENT B

continued on the attached page and made a part hereof.

/s/ Mallory Farrar

Mallory Farrar, Special Agent
Federal Bureau of Investigation

Special Agent Farrar attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)
on this 10th day of March 2025.



Honorable André M. Espinosa
United States Magistrate Judge

ATTACHMENT A

COUNT ONE
(Production of Child Pornography)

In or around November to December 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

did knowingly use, persuade, induce, entice, and coerce Minor Victim-1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely, by computer, and such visual depiction was actually transported or transmitted using a means and facility of interstate or foreign commerce, namely by computer.

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

COUNT TWO
(Coercion and Enticement)

In or around November to December 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim-1, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, the production of child pornography as defined in Title 18, United States Code, Section 2256(8).

In violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT THREE
(Production of Child Pornography)

In or around November to December 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

did knowingly use, persuade, induce, entice, and coerce Minor Victim-2 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely, by computer, and such visual depiction was actually transported or transmitted using a means and facility of interstate or foreign commerce, namely, by computer.

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

COUNT FOUR
(Coercion and Enticement)

In or around November to December 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim-2, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, the production of child pornography as defined Title 18, United States Code, Section 2256(8).

In violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT FIVE
(Distribution of Child Pornography)

In or around November to December 2023, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate commerce and foreign commerce, and that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT SIX
(Possession of Child Pornography)

Between on or about November 2023 to December 19, 2024, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JULIAN NOVA,

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, namely, 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, namely, by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

ATTACHMENT B

I, Mallory Farrar, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. 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 Complaint, defendant Julian Nova ("Nova") was a resident of Bayonne, New Jersey.

2. This case involves the production, distribution, and possession of child pornography as defined in 18 U.S.C. § 2256(8). I am aware that the statutory definition of child pornography includes visual depictions of minors engaged in sexually explicit conduct, and that "sexually explicit conduct" includes both sadistic or masochistic abuse as well as lascivious exhibition of the anus, genitals, or pubic area. 18 U.S.C. § 2256(2)(A)(iv)-(v) and (8).

Initial Investigation

3. In February 2024, while investigating a child exploitation offender referred to here as "Subject-1," FBI agents located a victim in Cobb County, Georgia. The FBI passed information to the Cobb County Police Department ("CCPD"), which undertook its own investigation. CCPD identified an offender associated with Subject-1, who was using an Instagram account (the "Instagram Account"). That offender was later identified as Nova, as set forth in more detail below. On or about February 21, 2024, CCPD executed a search warrant on that account (the "Instagram Search Warrant.").

Identification of Julian Nova

4. In response to the Instagram Search Warrant, Instagram provided account data, including the registration IP address ("IP Address-1"), which was located in Bayonne, New Jersey, an email address, and a date of birth.

5. Using open-source databases, CCPD searched for individuals in Bayonne, New Jersey with the date of birth matching that on the Instagram Account, and located one individual, Nova.

6. The Instagram Search Warrant return also contained numerous logins from another IP address ("IP Address-2"). Both IP Address-1 and IP Address-2 were associated with a particular internet service provider ("ISP"). ISP subpoena returns indicated that Nova's mother was the subscriber of the ISP account and listed an address in Bayonne, New Jersey (the "Bayonne Residence").¹

7. CCPD and FBI's examination of the Instagram Search Warrant return revealed evidence that, in November and December of 2023, Nova engaged in a pattern of child exploitation conduct, including coercing minor victims to produce child pornography as defined in 18 U.S.C. § 2256(8) and distributing child pornography via Instagram.

Nova's Child Pornography Distribution in a Group Chat

8. Beginning on or about November 21, 2023, Nova participated in a group chat on Instagram with the two users ("User-1" and "User-2"). At the beginning of the conversation, Nova posted a hyperlink to a pornographic website and referred by name to a minor victim suspected to reside in the Philippines ("Minor Victim-A").² Nova told the other group members that the link was to Minor Victim-A's "2nd porn video," and wrote, "The fact she's only 14 and now a porn star is crazy." Nova later posted several sexually explicit pictures of Minor Victim-A, who, based on my training and experience, appears to be about 14 years of age.

9. Nova also posted a video depicting a fully nude minor female ("Minor Victim-B"), whom Nova referred to as his "slave." Nova also posted several nude images of Minor Victim-B with derogatory writing on her body. Investigators located Minor Victim-B, who resided outside the District of New Jersey, and confirmed that she was a minor at the time she was coerced into producing the child pornography of herself that Nova distributed.

10. On or about November 23, 2023, Nova posted a sexually explicit image of Minor Victim-1. Nova referred to her as "14 year old slave [Minor

¹ Law enforcement is aware that this individual is Nova's mother both from open-source databases and its investigation. Namely, when members of the New Jersey Internet Crimes Against Children Task Force attempted to interview Nova at the Bayonne Residence, in relation to an earlier investigation, the woman identified herself as Nova's mother and refused to allow law enforcement to speak with him because he was a minor at the time.

² In this affidavit, the victims of the criminal conduct described in Counts One through Four are referred to by number: that is, Minor Victim-1 and Minor Victim-2. Other minor victims are listed by letter: that is, Minor Victim-A and Minor Victim-B.

Victim-1's first name].” Minor Victim-1 was indeed 14 years old at the time. In the image, Minor Victim-1 was fully nude, and her pubic area was visible. There was black writing all over Minor Victim-1's body, including the word “WHORE” written across her face with her opened mouth serving as the “O”; her age (14) written on her outstretched tongue; and various sexual, derogatory terms written on her torso, including “RAPE ME,” “SLUT,” “SEX SLAVE,” and “CUMP (sic) DUMP.”

11. On or about December 6, 2023, Nova asked the other two users if they wanted to help him “control some slaves.” User-1 responded “Yes,” and then referred to the victim he thought was the “best one” and wrote, “Lets blackmail her.”

Nova's Exploitation of Minor Victim-1

12. The Instagram Search Warrant return further revealed that Nova was in direct communication with Minor Victim-1 via Instagram and coerced her to produce child pornography of herself, including the image he distributed to the group chat.

13. FBI agents identified Minor Victim-1 as a female born in 2009 and living outside the District of New Jersey. In a December 2024 interview, Minor Victim-1 told the FBI that, in or around November 2023, she was contacted on Instagram by the Instagram Account. She recalled that the Instagram Account's profile picture was a close-up image of a duck, which is consistent with profile picture for the Instagram Account provided in response to the Instagram Search Warrant. The Instagram Account pretended to be a teenage girl and sent pictures of a nude approximately 15 or 16-year-old female, claiming they were the Instagram Account's own pictures. The Instagram Account then enticed Minor Victim-1 to send sexually explicit images of herself, and she complied. The Instagram Account eventually revealed to Minor Victim-1 that he was a male and demanded that Minor Victim-1 send more sexually explicit images, and threatened to distribute her nude images to Minor Victim-1's family if she did not comply.

14. Minor Victim-1 recalled that the Instagram Account requested images of her performing extreme and degrading acts, including one specific request that she write “cum dump” on her body and her age (14) on her tongue – consistent with the child pornography image of Minor Victim-1 that Nova distributed to the group chat discussed above.

15. Minor Victim-1 identified her Instagram username and told law enforcement that the Instagram Account would send her voice messages via Instagram. Indeed, the Instagram Search Warrant return contains voice messages sent from Nova to Minor Victim-1's account, as well as many written text messages. In voice messages dated on or about December 1, 2023, during

sessions where Nova was logged in from an IP address associated with the Bayonne Residence, he told Minor Victim-1 that she was being “blackmailed,” was his “slave,” and could earn her “freedom” by doing a “finale video.” On or about December 19, 2024, I spent approximately three hours interviewing Nova, who has a deep voice and a distinctive manner of speaking. I recognize the person speaking in the December 1, 2023, Instagram voice message as Nova.

Nova’s Exploitation of Minor Victim-2

16. Evidence from the Instagram Search Warrant return also showed that Nova had direct communications via Instagram with Minor Victim-2, that he coerced her into producing child pornography depicting herself, and that he distributed that child pornography to others.

17. FBI agents identified Minor Victim-2 as a female born in 2007 and living outside the District of New Jersey. During an October 2024 interview, Minor Victim-2 told the FBI that, in or around late October 2023, Subject-1 (the same individual described in ¶ 3 above) contacted her on a messaging application and revealed that he had found a topless photo of her. Subject-1 threatened to send the image to Minor Victim-2’s family unless she produced more sexually explicit imagery. Eventually, Subject-1 passed Minor Victim-2 to Nova, who communicated with Minor Victim-2 via another messaging application and coerced her into producing sexually explicit imagery on Subject-1’s behalf. Minor Victim-2 stated that both Nova and Subject-1 were aware of her age (16) at the time.

18. Later, Nova told Minor Victim-2 to follow the Instagram Account. Using the Instagram Account, Nova blackmailed Minor Victim-2 into producing and sending additional sexually explicit imagery. This time, according to Minor Victim-2, Nova claimed he was acting on behalf of another individual, Subject-2. Nova claimed that he was being blackmailed by Subject-2 and that he needed to get Minor Victim-2 to do a list of 10 things, and after she completed them, her abuse would stop. Nova had Minor Victim-2 send images of herself nude with sexual and derogatory writings on her body, including “rape me,” “cunt,” “use me,” and “whore” (across her face, with her mouth serving as the “o”). Nova also forced Minor Victim-2 to create images in which she had racial slurs written on her body and a pentagram drawn on her forehead.

19. The Instagram Search Warrant returns corroborate Minor Victim-2’s statements. For example, the Instagram Search Warrant returns show that, on or about December 1, 2023, Nova wrote to Minor Victim-A and offered to show her what he was making Minor Victim-2 do for him. Nova then sent several images of Minor Victim-2 completely nude, with sexual, derogatory writings covering her body. These included the word “whore” across her face (with her mouth serving as the “o”), and on her torso, words including “slave,”

“slut” and “rape me.” In several of these images, Minor Victim-2’s bare pubic area is visible.

20. Minor Victim-2 provided the FBI with the Instagram username she used when communicating with Nova. The Instagram Search Warrant return also contained communications between Nova and Minor Victim-2. In a conversation from on or about December 2, 2023, Nova told Minor Victim-2 that Subject-2 had retired and that she “finally” had “freedom.” Minor Victim-2 asked if she was still Nova’s “slave,” to which Nova replied, “Yea.”

21. On or about November 30, 2023, and on or about December 6, 2023, Nova sent Instagram voice messages to Minor Victim-2. As with the voice messages to Minor Victim-1, I recognized these as recordings of Nova’s voice, which confirms that Nova was in control of the Instagram Account while exploiting Minor Victim-2.

Interview of Nova and Search of Nova’s Home and Electronics

22. On or about December 17, 2024, U.S. Magistrate Judge James B. Clark, III, signed a search warrant authorizing a search of Julian Nova’s person and the Bayonne Residence. See Mag. No. 24-12320, 24-12321. FBI agents executed the search warrants on or about December 19, 2024, and found Nova at the Bayonne Residence. Nova waived his *Miranda* rights and agreed to speak with me and other FBI agents.

23. Nova admitted that he lived at the Bayonne Residence and that he was engaged in blackmailing. He declined to discuss his own actions with respect to specific victims, but spoke of his involvement with other blackmailers, including Subject-1 and Subject-2. He said, “there’s a whole system,” “I was someone who was part of that system,” and, “It became an addiction, in a way, for me – the whole blackmail thing.” At other points in the interview, Nova reiterated, “I’ve done the blackmail thing,” and said his motivation at first was “more of the sexual gratification,” “but then eventually it just became a power thing.” He described the feeling of power and control over victims as like a “drug” and discussed how difficult it was for him to stop. When asked when he last engaged in this type of behavior, he replied “last week.”

24. I showed Nova a picture of Minor Victim-1, and Nova correctly identified her by first name. He claimed she was someone who was blackmailed by another offender but “was talked to on my account.”

25. I showed Nova a picture of Minor Victim-2, and Nova also identified her by first name. He said, “I was friends with her.” When asked how he met her, Nova replied, “Originally, [Subject-1] had her blackmailed” and “I helped

him,” but he claimed he later helped Minor Victim-2 and they became “genuine friends.”

26. Agents seized Nova’s cell phone from his person and analyzed it pursuant to the search warrant. On the phone, they found the sexually explicit image of Minor Victim-1 described in paragraph 10 above. They also found several sexually explicit images of Minor Victim-2, including one in which she is completely nude with her pubic area visible and has a pentagram drawn on her forehead and sexual, derogatory terms written on her body, including “rape me,” and “slut.” Another photo depicted Minor Victim-2 bending over and displaying her anus and genitalia. The phone also contained child pornography depicting Minor Victim-A and Minor Victim-B.