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

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. : **Magistrate No. 19-4099**
ANDREW CHU :


I, Jill C. Lasseter, 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 United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Special Agent Jill C. Lasseter
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

February 6, 2019 at Newark, New Jersey
Date City and State



Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

Count 1
(Receipt of Child Pornography)

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 receive material containing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce and that had been mailed, and had been 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)(2)(A) and Section 2.

ATTACHMENT B

I, Jill C. Lasseter, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and part. 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. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

Background

1. At all times relevant to this Complaint, defendant ANDREW CHU ("CHU") was a resident of Garwood, New Jersey.

The Investigation

2. The "Website" is an online child-pornography website with an address known to law enforcement. The Website is operated as a "hidden service" on the computer network known as Tor ("the Onion Router"), which is designed specifically to facilitate anonymous communication over the Internet by, among other things, bouncing a user's communications around a distributed network of relay computers all over the world, making it impossible to identify a user through conventional means. Websites set up as Tor "hidden services" operate as ordinary public websites do, with one critical exception: the IP address (and thus the location) of the web server is hidden and replaced with a Tor-based web address comprised of a series of algorithm-generated alphanumeric characters, such as "asdlk8fs9dfiku7f," followed by the suffix ".onion." A user can reach such a "hidden service" – including the Website – only by downloading and using the Tor software to access the Tor network.

3. Users can purchase images and videos of child pornography for download from the Website using Bitcoin ("BTC"), a virtual currency circulated over the Internet and controlled by a decentralized peer-to-peer network. BTC transactions are conducted using BTC "addresses" consisting of alphanumeric strings, each of which is controlled by a unique private alphanumeric key akin to a password or PIN.

4. Law enforcement officers investigating the Website observed that, from on or about February 13, 2018 through on or about February 14, 2018, the user of a certain BTC account with the U.S. Bitcoin Exchange Coinbase (the "Target Account") transferred approximately 0.01 BTC (then valued at approximately \$90.21) to a BTC address associated with The Website.

5. Investigation revealed that the Target Account was associated with CHU's name and a credit-card account (the "CC Account") and bank account (the "Bank Account") held in CHU's name. The Target Account was also associated with an email address and a telephone number that have subsequently been confirmed as belonging to CHU.

6. Law enforcement agents reviewed several videos that the user of the Target Account downloaded from the Website from on or about February 14, 2018 through on or about February 25, 2018. The file names and descriptions of those videos are as follows:

File Name	Target User Download Date	Description
Marina1.mp4	February 25, 2018	This video is approximately 5:24 minutes long and depicts a prepubescent girl who appears to be 8-10 years old. The child is in a bathroom and appears to be communicating with someone via phone or computer while undressing. She shows a close up of her anus and vagina and masturbates for several seconds.
video 2017-12-17 14-09-33.mp4 NEW!6yo girl first anal try	February 14, 2018	The video is approximately 1:06 minutes long and depicts an approximately 5 to 6 year old girl on a bed on her knees and elbows. She is wearing a tank top and black leggings, which are pulled down revealing her buttocks and vagina. An adult male, among other things, moves his face towards the girl's buttocks and appears to place his mouth on her vagina. He later puts his erect penis against the child's anus and attempts to penetrate the child.

<p>video_2017-12-06_14-54-36.mpg</p> <p>-15</p>	<p>February 14, 2018</p>	<p>This video is approximately 5:27 minutes long and depicts an approximately 5 to 7 year old girl wearing a pink tank top and shorts. An adult male, among other things, picks up the child so she is straddling his penis, has the child perform oral sex on him, and later masturbates until he ejaculates on the child's stomach.</p>
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7. Based upon my education, training, and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the files described in paragraph 6 above traveled in interstate commerce, via the Internet.

8. On or about February 6, 2019, law enforcement executed a lawfully obtained search warrant at CHU's residence in Garwood, New Jersey (the "Residence"). At the Residence, law enforcement discovered and seized computer equipment belonging to CHU. A preliminary examination of that equipment revealed that at least one of CHU's computers contains the Tor software needed to access the Website.

9. During the search, law enforcement officers also found and seized financial records confirming that the CC Account and Bank Account associated with the Target Account belong to CHU.