
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. José R. Almonte
 :
 v. : Mag. No. 22-16000
 :
 STEPHEN HUDSON : **CRIMINAL COMPLAINT**
 :
 :
 :

I, Isidro Cruz, 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 ("HSI"), assigned to the Special Agent in Charge in the District of New Jersey, and that this complaint is based on the following facts:

SEE ATTACHMENT B

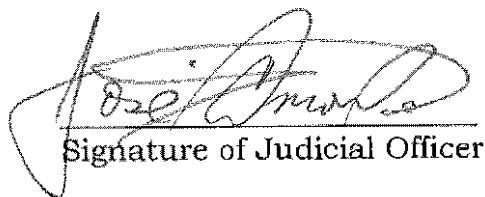
continued on the attached page and made a part hereof.

/s/ Isidro Cruz

Isidro Cruz, Special Agent
U.S. Department of Homeland Security

Special Agent Cruz attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 9th day of May, 2022.

Honorable José R. Almonte
United States Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

Count One

Attempt to Entice a Minor to Engage in Sexual Activity

From on or about April 14, 2022 through on or about May 6, 2022, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

STEPHEN HUDSON,

did knowingly use a facility or means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce individuals, believed not to have attained the age of eighteen years, to engage in any sexual activity for which any person could be charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

Count Two
Travel with the Intent to Engage in Illicit Sexual Conduct

On or about May 6, 2022, in the District of New Jersey and elsewhere, the defendant,

STEPHEN HUDSON,

did knowingly travel in interstate commerce from Massachusetts to New Jersey, for the purpose of engaging in any illicit sexual conduct, that is sexual conduct, as that term is defined in Title 18, United States Code, Section 2246, with another person believed to be under eighteen years of age, which sexual conduct would constitute a violation of Title 18, United States Code, Chapter 109A.

In violation of Title 18, United States Code, Section 2423(b).

ATTACHMENT B

1. I, Isidro Cruz, am a Special Agent with the Department of Homeland Security (“HSI”). 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.

2. On or about April 14, 2022, a law enforcement officer, while acting in an undercover capacity (hereinafter, “UC-1”), received an email from an individual using the username “funukchat111” and later identified as the defendant Stephen Hudson (“HUDSON”). HUDSON sent the email from a Protonmail.com email address.¹

3. On or about April 14, 2022, HUDSON informed UC-1 that he would be in Massachusetts “end of month, early may.”

4. The following is an excerpt of that communication:

HUDSON: “will be in mass end of month, early may[.] can be free fri/sat two weekends[.] might you have something going on ? would love to have a discreet/secure high n horny session with like minded adults/yng²”

UC-1: “How old are you looking for?”

HUDSON: “hi[.] I am pretty openminded. love them with small breasts, can be fucked long and hard[.] yourself ?”

¹ ProtonMail is an end-to-end encrypted email service founded in Geneva, Switzerland. ProtonMail uses client-side encryption to protect email content and user data before they are sent to ProtonMail servers, unlike other common email providers. In my training and experience and based upon my conversations with other law enforcement officers, ProtonMail is often employed by individuals who seek to shield their illegal activities from law enforcement. The encryption of emails makes identifying users difficult.

² Based on my training and experience, I am aware that the term “yng” refers to young, minor children.

UC-1: "That's why I'm asking. We can have an 8yo³ or 11 and 12yo for you next month. Do you have experience with anything as young as 8yo?"

HUDSON: "no i do not[.] that sounds very very erotic, love the idea of 12yo too[.] can 8yo be fucked too[?] I would probably like to watch another guy with 8yo to start with ? getting high, chems[,]⁴ seeing them become high , is that possible ?"

UC-1: "That's why I asked. 8 yo can be fucked but carefully. Very delicate. We can definitely arrange a viewing session too. What type of Chems? You will need to provide those."

HUDSON: "oh yes i see of course. viewing and taking part with 8/12 ? small party type scenario[.] I love coke, if others are partaking too , especially ynger girls[.] I can pay for this if it can be provided, I would struggle to get as on business trip ?"

5. Between on or about April 15, 2022, and on or about April 22, 2022, HUDSON continued to communicate via email with UC-1, stating his continued interest in meeting with the minor females for sex. During the email exchanges, UC-1 explained that the twelve-year-old was his girlfriend's daughter and that his friend's daughter "is the younger girl." In fact, UC-1's friend is an HSI agent acting in an undercover capacity (hereinafter, "UC-2"). UC-1 instructed HUDSON to email UC-2.

6. On or about April 22, 2022, HUDSON emailed UC-2, stating, "been chatting with [UC-1] and hopefully arrange a hookup and some party fun [. . .] i believe you have a dau⁵ and may well join us to party? looking forward to some erotic high n horny fun."

7. Official flight records obtained by law enforcement showed that HUDSON, who is a British citizen, boarded a flight from London, England and arrived in Boston, Massachusetts on or about April 22, 2022.

8. On or about April 23, 2022, HUDSON advised UC-2 that he and UC-1

³ Based on my training and experience, I am aware that the abbreviation "yo" refers to "years old" or "year-old."

⁴ Based on my training and experience, I am aware that the term "chems" refers to drugs.

⁵ Based on my training and experience, I am aware that the term "dau" is an abbreviation for "daughter."

have been in contact for “a few years” and “[h]ave tried to meet up but Covid ruined plans !” He also stated that he “will be coming down from Mass, outside Boston..”

9. Thereafter, on or about April 24 and April 25, 2022, UC-2 described his daughter as an eleven-year-old. HUDSON communicated his interest in “oral,⁶ penetration⁷ if possible,” and “spitroast”⁸ with UC-2’s eleven-year-old daughter. HUDSON also expressed his interest in having both minor children under the influence of controlled substances during their encounter.

10. On or about April 29, 2022, HUDSON sent UC-2 a link to a file-sharing site, stating “just some hc⁹ pics” and later stating “has nude and hc pics.” The link directed law enforcement to visual depictions of child sexual abuse, including an image that appears to depict a partially unclothed prepubescent female on a bed while laying on her back and exposing her vagina.

11. On or about May 1, 2022, HUDSON sent UC-1 a redacted copy of his “Record of Foreign Travel Notification by a Registered Sex Offender for Police Records.” Law enforcement subsequently confirmed with the Metropolitan Police Service in England that HUDSON is currently on the sex offenders registry in England and that HUDSON submitted a “Record of Foreign Travel Notification by a Registered Sex Offender for Police Records.”

12. On or about May 4, 2022, HUDSON sent two images to UC-1 depicting quantities of US currency to be paid by HUDSON for access to the minor females for sexual activity. The first image (hereinafter, “image 1”) displays approximately ten \$50 bills wherein a serial number on one bill is clearly visible. Atop the currency depicted in image 1 is a handwritten note greeting UC-1 and signed “Funchat”, an abbreviation of HUDSON’s email username “funukchat111.” The second image (hereinafter, “image 2”) displays a quantity of US currency. Atop the currency depicted in image 2 is a handwritten note dated “5-4-22” greeting UC-1’s girlfriend (hereinafter, “UC-3”) and directing the money to UC-3 and to one of the minor females. The handwritten note in image 2 is also signed “FunChat” followed by a smiley face.

⁶ Based on my training and experience, I am aware that the term “oral” refers to oral sex.

⁷ Based on my training and experience, I am aware that the term “penetration” refers to penetrative sex.

⁸ Based on my training and experience, I am aware that the term “spitroast” refers to a sexual act involving three individuals.

⁹ Based on my training and experience, I am aware that the term “hc” is an abbreviation for the term “hardcore.”

13. On or about May 5 through May 6, 2022, HUDSON agreed to drive to an address located in Woodcliff Lake, New Jersey (hereinafter, the "Woodcliff Lake Location") to meet with UC-1 and UC-3, and pay them in total approximately \$1,200 in cash.

14. Communications between UC-1 and HUDSON, and between UC-2 and HUDSON, demonstrate that HUDSON agreed that the payment would be in exchange for, among other things:

- i. drugs, including cocaine;
- ii. giving drugs and/or alcohol to an eleven-year-old, described as UC-2's daughter, and a twelve-year-old, described as UC-3's daughter;
- iii. providing HUDSON with access to the eleven and twelve-year-old minor females; and
- iv. allowing HUDSON to engage in sexual acts with the eleven and twelve-year-old minor females.

15. HUDSON agreed to supply wine and condoms, and arranged that after making payment, HUDSON would enter the Woodcliff Lake Location to engage in sexual acts with the two minor females, among other things.

16. On or about May 6, 2022, at approximately 6:30 PM, law enforcement observed HUDSON arrive at the Woodcliff Lake Location by car. Upon exiting the car, HUDSON, who was carrying a bookbag and a plastic bag, met with UC-1 and UC-3, and handed the plastic bag to UC-1.

17. Law enforcement agents then arrested HUDSON and conducted a search of HUDSON incident to arrest. The agents recovered, among other things, a cell phone and wallet, which contained HUDSON's driver's license and credit cards in his name.

18. A search of the bag that HUDSON gave to UC-1 revealed approximately \$1,200 in cash in a cardboard box, including one \$50 bill that had a serial number matching the serial number that was on a \$50 bill shown in image 1 and image 2. A search of HUDSON'S bookbag uncovered, among other things, condoms, tadalafil¹⁰ pills, two bottles of wine, and a vibrator.

19. After his arrest, HUDSON was advised of his Miranda rights and

¹⁰ Based on a review of online resources, I am aware that tadalafil is used to treat male erectile dysfunction, among other conditions.

waived them in writing. HUDSON then provided an audio-and-video-recorded statement. HUDSON stated he had travelled from Massachusetts to New Jersey and communicated by email with UC-1 using a Protonmail.com email address. HUDSON admitted to using a variation of the "funchat" username.