

MONMOUTH COUNTY PROSECUTOR
132 JERSEYVILLE AVENUE
FREEHOLD, NJ 07728-2374

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

INDICTMENT No. 18-02-00145

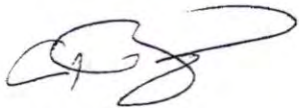
STATE OF NEW JERSEY :
 :
Plaintiff, : DEMAND FOR
 : BILL OF PARTICULARS
v. : WHERE ALIBI IS RELIED
 : UPON BY DEFENDANT
 :
TERRY Y. KUO a/k/a :
"VICTOR LEE", :
..... :
Defendant. :

TO Terry Y. Kuo a/k/a
Victor Lee DOB 06/11/1991
.....
2 Armistead Key
.....
Colts Neck, New Jersey 07722
.....

PURSUANT TO R. 3:12-2,

If you, the defendant in this case, in any way intend to rely on the defense of alibi, the State demands that within ten (10) days after receipt of this written demand, you furnish to the State a written bill of particulars, signed by you, the defendant, stating the specific place or places at which you claim to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom you wanted to rely to establish your alibi.

DATED February 2, 2018
17-04743


.....
Monmouth County Prosecutor

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION (CRIMINAL)
MONMOUTH COUNTY

THE STATE OF NEW JERSEY

:

Plaintiff,

:

v.

:

Indictment No. 18-02-00145
Case No. 17-04743

TERRY Y. KUO a/k/a
"VICTOR LEE",

:

:

Defendant.

FIRST COUNT

ATTEMPTED AGGRAVATED SEXUAL ASSAULT

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about May 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did attempt to commit the crime of Aggravated Sexual Assault, by attempting to commit an act of sexual penetration with [REDACTED] while [REDACTED] was less than 13 years old, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:14-2a(1), and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

ATTEMPTED SEXUAL ASSAULT

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about May 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the

jurisdiction of this Court, did attempt to commit the crime of Sexual Assault, by attempting to commit an act of sexual contact upon [REDACTED] less than 13 years of age, while TERRY Y. KUO a/k/a "VICTOR LEE" was at least four years older than [REDACTED] contrary to the provisions of N.J.S.A. 2C:14-2b, and against the peace of this State, the Government, and dignity of the same.

THIRD COUNT

ENDANGERING THE WELFARE OF A CHILD

(MANUFACTURE OF CHILD PORNOGRAPHY)

FIRST DEGREE CRIME

The Grand Jurors for the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about May 24, 2017, in or about the Township of Marlboro, County of Monmouth and within the jurisdiction of this Court, did commit the crime of Endangering the Welfare of a Child by causing or permitting a child to engage in a prohibited sexual act or in the simulation of such an act knowing or intending that the prohibited act may be photographed, filmed, reproduced, or reconstructed in any manner, including on the Internet, or may be part of an exhibition of performance, contrary to the provisions of N.J.S.A. 2C:24-4(b)3, and against the peace of this State, the Government, and dignity of the same.

FOURTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(MANUFACTURE OF CHILD PORNOGRAPHY)

SECOND DEGREE CRIME

The Grand Jurors for the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about May 24, 2017, in or about the Township of Marlboro, County of Monmouth and within the jurisdiction of this Court, did commit the crime of Endangering the Welfare of a Child by knowingly photographing or filming a child in a prohibited sexual act or in the simulation of such an act or by using any device, including a computer, to reproduce or reconstruct the image of a child in a prohibited sexual act or in the simulation of such an act, contrary to the provisions of N.J.S.A 2C:24-4(b)4, and against the peace of this State, the Government and dignity of the same.

FIFTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(POSSESSION OF CHILD PORNOGRAPHY)

THIRD DEGREE CRIME

The Grand Jurors for the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between May 24, 2017 through November 11, 2017, in or about the Township of Marlboro and/or the Township of Colts Neck, County of Monmouth and within the jurisdiction of this Court, did commit the crime of Endangering the Welfare of a Child by knowingly possessing

or knowingly viewing any photograph, film, videotape, computer program or file, video game or any other reproduction or reconstruction which depicts a child engaging in a prohibited sexual act or in the simulation of such an act, including on the Internet, contrary to the provisions of N.J.S.A. 2C:24-4(b)5(b), and against the peace of this State, the Government, and dignity of the same.

SIXTH COUNT

LEWDNESS

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about May 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Lewdness, in that he exposed his intimate parts for the purpose of arousing or gratifying his sexual desire or the sexual desire of another person under circumstances where he knew or reasonably expected that he was likely to be observed by a child less than 13 years of age, namely [REDACTED] less than 13 years of age, where TERRY Y. KUO was at least four years older than the child, contrary to the provisions of N.J.S.A. 2C:14-4b(1), and against the peace of this State, the Government, and dignity of the same.

SEVENTH COUNT

AGGRAVATED CRIMINAL SEXUAL CONTACT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about September 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] and [REDACTED] was at least 13 but less than 16 years old and TERRY Y. KUO had supervisory or disciplinary power over [REDACTED] by virtue of TERRY Y. KUO's legal, professional or occupational status, contrary to the provisions of N.J.S.A. 2C:14-3a, and against the peace of this State, the Government, and dignity of the same.

EIGHTH COUNT

AGGRAVATED CRIMINAL SEXUAL CONTACT

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about October 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] and [REDACTED] was at least 13 but less than 16 years old and TERRY Y. KUO had supervisory or disciplinary power over [REDACTED] by virtue of TERRY Y. KUO's legal, professional or occupational

status, contrary to the provisions of N.J.S.A. 2C:14-3a, and against the peace of this State, the Government and dignity of the same.

NINTH COUNT

STALKING

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between September 2017 through November 2017, in about the Township of Marlboro and/or the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Stalking, by purposefully or knowingly engaging in a course of conduct directed at [REDACTED] which would cause a reasonable person to fear for her safety, or the safety of a third person, or suffer other emotional distress, contrary to the provisions of N.J.S.A. 2C:12-10, and against the peace of this State, the Government, and dignity of the same.

TENTH COUNT

ENDANGERING THE WELFARE OF A CHILD

SECOND DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between May through November 2017, in about the Township of Marlboro and/or the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Endangering

the Welfare of a Child, by engaging in sexual conduct which would impair or debauch the morals of a child, to wit: [REDACTED] less than 13 years of age, contrary to the provisions of N.J.S.A. 2C:24-4a(1) and against the peace of this State, the Government, and dignity of the same.

ELEVENTH COUNT

ENDANGERING THE WELFARE OF A CHILD

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between May through November 2017, in about the Township of Marlboro and/or the Township of Colts Neck, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Endangering the Welfare of a Child, by engaging in sexual conduct which would impair or debauch the morals of a child, to wit: [REDACTED] less than 13 years of age, contrary to the provisions of N.J.S.A. 2C:24-4a(1) and against the peace of this State, the Government, and dignity of the same.

TWELFTH COUNT

ENDANGERING THE WELFARE OF A CHILD

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO, on or about November 10 and/or 11, 2017, in about the Township of Colts Neck and/or the Township of Manalapan, County of Monmouth, and within the jurisdiction of this Court, did commit

the crime of Endangering the Welfare of a Child, by causing a child, to wit: [REDACTED] less than 13 years of age, harm which would make the child an abused or neglected child as defined in N.J.S.A. 9:6-1, N.J.S.A. 9:6-3 and N.J.S.A. 9:6-8.21, contrary to the provisions of N.J.S.A. 2C:24-4a(2) and against the peace of this State, the Government, and dignity of the same.

THIRTEENTH COUNT

OBSCENITY FOR PERSON UNDER 18

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between May through September 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Obscenity, by knowingly showing obscene material to a person under 18 years of age, to wit: [REDACTED] with the knowledge or purpose to arouse, gratify or stimulate himself or another, and TERRY Y. KUO was at least four years older than [REDACTED] contrary to the provisions of N.J.S.A. 2C:34-3b(2), and against the peace of this State, the Government, and dignity of the same.

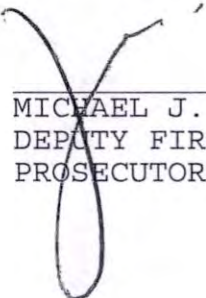
FOURTEENTH COUNT

OBSCENITY FOR PERSON UNDER 18

THIRD DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY Y. KUO a/k/a "VICTOR LEE", on or about diverse dates between May

through September 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Obscenity, by knowingly showing obscene material to a person under 18 years of age, to wit: [REDACTED] with the knowledge or purpose to arouse, gratify or stimulate himself or another, and TERRY Y. KUO a/k/a "VICTOR LEE" was at least four years older than [REDACTED] contrary to the provisions of N.J.S.A. 2C:34-3b(2), and against the peace of this State, the Government, and dignity of the same.



MICHAEL J. WOJCIECHOWSKI
DEPUTY FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson