

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

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

INDICTMENT No. 18-120163C

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

TO Terry 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 December 21, 2018
17-04743



.....
Monmouth County Prosecutor

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

THE STATE OF NEW JERSEY

:

Plaintiff,

:

v.

:

SUPERCEDING

Indictment No. 18-12-01636

Case No. 07-04743

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

:

:

Defendant.

FIRST COUNT

KIDNAPPING

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY 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 Kidnapping, by unlawfully removing [REDACTED] a substantial distance from the vicinity where she was found and/or by unlawfully confining [REDACTED] for a substantial period with purpose to facilitate the commission of a crime or flight thereafter, while [REDACTED] was less than 16 years old and a crime under N.S.J.A. 2C:14-2, N.J.S.A. 2C:14-3a or N.J.S.A. 2C:24-4b was committed against [REDACTED] contrary to the provisions of N.J.S.A. 2C:13-1b, and against the peace of this State, the Government, and dignity of the same.

SECOND COUNT

ATTEMPTED AGGRAVATED 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 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 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.

THIRD COUNT

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 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 Sexual Assault, by committing an act of sexual contact upon [REDACTED] 2 years of age, while TERRY 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.

FOURTH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY 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 Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

FIFTH 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 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.

SIXTH 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 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

J 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.

SIXTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(MANUFACTURE OF CHILD PORNOGRAPHY)

SECOND DEGREE CRIME

J The Grand Jurors for the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY 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.

SEVENTH 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 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.

EIGHTH 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 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, by exposing 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] 12 years of age, where TERRY KUO a/k/a "VICTOR LEE" was at least four years older than [REDACTED], contrary to the provisions of N.J.S.A. 2C:14-4b(1), and against the peace of this State, the Government, and dignity of the same.

NINTH COUNT

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 KUO a/k/a "VICTOR LEE", on or about June 27, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Sexual

jurisdiction of this Court, did commit the crime of Sexual Assault, by committing an act of sexual contact upon [REDACTED] 2 years of age, while TERRY 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.

TENTH 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 KUO a/k/a "VICTOR LEE", on or about June 27, 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 an act of sexual contact upon [REDACTED] 12 years of age, while TERRY KUO a/k/a "VICTOR LEE" was at least four years older than [REDACTED], contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:14-2b, and against the peace of this State, the Government, and dignity of the same.

ELEVENTH 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 KUO

a/k/a "VICTOR LEE", on or about June 27, 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 committing an act of sexual penetration with [REDACTED] while using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:5-1 and N.J.S.A. 2C:14-2c(1), and against the peace of this State, the Government, and dignity of the same.

TWELFTH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about June 27, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

THIRTEENTH 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 KUO a/k/a "VICTOR LEE", on or about June 27, 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.

FOURTEENTH 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 KUO a/k/a "VICTOR LEE", on or about June 27, 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.

FIFTEENTH 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between June 27, 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.

SIXTEENTH COUNT

KIDNAPPING

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Kidnapping, by unlawfully removing [REDACTED] a substantial distance from the vicinity where she was found and/or by unlawfully confining [REDACTED] for a substantial period with purpose to facilitate the commission of a crime or flight thereafter, while [REDACTED] was less than 16 years old and a crime under N.S.J.A. 2C:14-2, N.J.S.A. 2C:14-3a or N.J.S.A. 2C:24-4b was committed against [REDACTED] contrary to the provisions of N.J.S.A. 2C:13-1b, and against the peace of this State, the Government, and dignity of the same.

SEVENTEENTH COUNT

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 KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Sexual Assault, by committing 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:14-2a(1), and against the peace of this State, the Government, and dignity of the same.

EIGHTEENTH COUNT

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 KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Sexual Assault, by committing an act of sexual contact upon [REDACTED] 12 years of age, while TERRY 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.

NINETEENTH COUNT

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 KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Sexual Assault, by committing an act of sexual penetration with [REDACTED] while using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2c(1), and against the peace of this State, the Government, and dignity of the same.

TWENTIETH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

TWENTY FIRST 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 KUO a/k/a "VICTOR LEE", on or about July 18, 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.

TWENTY SECOND 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 KUO a/k/a "VICTOR LEE", on or about July 18, 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.

TWENTY THIRD 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 KUO a/k/a "VICTOR LEE", on or about July 18, 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 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.

TWENTY FOURTH 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 KUO a/k/a "VICTOR LEE", on or about July 18, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Lewdness, by exposing 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] 12 years of age, where TERRY KUO a/k/a "VICTOR LEE" was at least four years older than [REDACTED] contrary to the provisions of N.J.S.A. 2C:14-4b(1), and against the peace of this State, the Government, and dignity of the same.

TWENTY FIFTH 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 KUO a/k/a "VICTOR LEE", on or about, between September 1, 2017 through September 30, 2017, in or about the Township of

through September 30, 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 KUO a/k/a "VICTOR LEE" had supervisory or disciplinary power over [REDACTED] by virtue of his 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.

TWENTY SIXTH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about, between September 1, 2017 through September 30, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED], while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

TWENTY SEVENTH COUNT
CRIMINAL SEXUAL CONTACT
FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about, between September 1, 2017 through September 30, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED], while [REDACTED] was at least 13 but less than 16 years old and TERRY KUO a/k/a "VICTOR LEE" was at least 4 years older than [REDACTED], contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

TWENTY 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 KUO a/k/a "VICTOR LEE", on or about, between October 1, 2017 through October 31, 2017, in or about the Township of Marlboro and/or the Township of Freehold, 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 TERRY KUO a/k/a "VICTOR LEE" had supervisory or disciplinary power over [REDACTED]. by virtue of his 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.

TWENTY NINTH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about, between October 1, 2017 through October 31, 2017, in or about the Township of Marlboro and/or the Township of Freehold, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

THIRTIETH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about, between October 1, 2017

through October 30, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED], while [REDACTED] was at least 13 but less than 16 years old and TERRY KUO a/k/a "VICTOR LEE" was at least 4 years older than [REDACTED], contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

THIRTY FIRST COUNT

KIDNAPPING

FIRST DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about October 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Kidnapping, by unlawfully removing [REDACTED] a substantial distance from the vicinity where she was found and/or by unlawfully confining [REDACTED] for a substantial period with purpose to facilitate the commission of a crime or flight thereafter, while [REDACTED] was less than 16 years old and a crime under N.S.J.A. 2C:14-2, N.J.S.A. 2C:14-3a or N.J.S.A. 2C:24-4b was committed against [REDACTED] contrary to the provisions of N.J.S.A. 2C:13-1b, and against the peace of this State, the Government, and dignity of the same.

THIRTY SECOND COUNT

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 KUO a/k/a "VICTOR LEE", on or about October 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Aggravated Sexual Assault, by committing an act of sexual penetration with [REDACTED] while [REDACTED] was at least 13 but less than 16 years old and TERRY KUO a/k/a "VICTOR LEE" had supervisory or disciplinary power over [REDACTED] by virtue of his legal, professional or occupational status, contrary to the provisions of N.J.S.A. 2C:14-2a(2)(b), and against the peace of this State, the Government, and dignity of the same.

THIRTY THIRD COUNT

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 KUO a/k/a "VICTOR LEE", on or about October 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Sexual Assault, by committing an act of sexual penetration with [REDACTED], while [REDACTED] was at least 13 but less than 16 years old and TERRY

KUO a/k/a "VICTOR LEE" was at least 4 years older than [REDACTED] contrary to the provisions of N.J.S.A. 2C:14-2c(4), and against the peace of this State, the Government, and dignity of the same.

THIRTY FOURTH COUNT

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 KUO a/k/a "VICTOR LEE", on or about October 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Sexual Assault, by committing an act of sexual penetration with [REDACTED] while using physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-2c(1), and against the peace of this State, the Government, and dignity of the same.

THIRTY FIFTH 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 KUO a/k/a "VICTOR LEE", on or about October 24, 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 KUO a/k/a "VICTOR LEE" had supervisory or disciplinary power over [REDACTED] by virtue of his 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.

THIRTY SIXTH COUNT

CRIMINAL SEXUAL CONTACT

FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about October 24, 2017, in or about the Township of Marlboro, County of Monmouth, and within the jurisdiction of this Court, did commit the crime of Criminal Sexual Contact, by committing an act of sexual contact with [REDACTED] while TERRY KUO a/k/a "VICTOR LEE" used physical force or coercion, contrary to the provisions of N.J.S.A. 2C:14-3b, and against the peace of this State, the Government, and dignity of the same.

THIRTY SEVENTH 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 KUO

a/k/a "VICTOR LEE", on or about October 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.

THIRTY EIGHTH 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 KUO a/k/a "VICTOR LEE", on or about October 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.

THIRTY NINTH 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between October 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.

FORTIETH 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 KUO a/k/a "VICTOR LEE", on or about November 11, 2017, in or 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] 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.

FORTY FIRST 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between September 1, 2017 through November 11, 2017, in or about the Township of Marlboro and/or the Township of Colts Neck and/or the City of Long Branch, 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 [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.

FORTY SECOND 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 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 and/or the City of Long Branch and/or the Township of Freehold, 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] 12 or 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.

FORTY THIRD 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between May 1, 2017 through November 11, 2017, in or about the Township of Marlboro and/or the Township of Freehold, 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] 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.

FORTY FOURTH 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between May, 2017 through November 11, 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 KUO a/k/a "VICTOR LEE" was at least 4 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.

FORTY FIFTH 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 KUO a/k/a "VICTOR LEE", on or about diverse dates between May, 2017 through November 11, 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 KUO a/k/a "VICTOR LEE" was at least 4 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.

FORTY SIXTH 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 KUO

a/k/a "VICTOR LEE", on or about November 13, 2017, in or about 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.

FORTY SEVENTH COUNT

CONSPIRACY

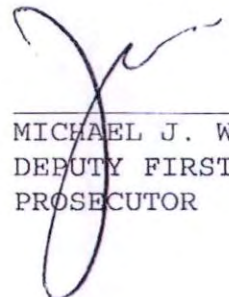
FOURTH DEGREE CRIME

The Grand Jurors of the State of New Jersey, for the County of Monmouth, upon their oaths present that TERRY KUO a/k/a "VICTOR LEE", on or about diverse dates between November 14, 2017 through February 22, 2018, in or about the Township of Freehold and/or the Township of Colts Neck, County of Monmouth and/or the City of Jersey City, Count of Hudson, and within the jurisdiction of this Court, did commit the crime of Conspiracy, by unlawfully agreeing with another that they, or either one of them, would commit the crime of Evidence Tampering with the purpose of promoting or facilitating the commission of said

crime and that in pursuance of such conspiracy and to effect the object thereof, the following overt acts were done:

OVERT ACTS

1. By instructing family members to remove items from his residence and secret them from law enforcement, contrary to the provisions of N.J.S.A. 2C:5-2 and N.J.S.A. 2C:28-6(1), and against the peace of this State, the Government, and dignity of the same.



MICHAEL J. WOJCIECHOWSKI
DEPUTY FIRST ASSISTANT
PROSECUTOR

Endorsed:

Foreperson