

MONMOUTH COUNTY PROSECUTOR
JERSEYVILLE AVENUE
FREEHOLD, NJ 07728-2374

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

Superseding
INDICTMENT No. 23-01-00109

STATE OF NEW JERSEY :
 :
Plaintiff, :
 :
v. :
 :
TERRY KUO a/k/a :
"VICTOR LEE", :
..... :
Defendant. :

TO Terry Kuo a/k/a :
"Victor Lee" :
DOB 06/11/1991 :
..... :
MCCI :
One Waterworks :
..... :
Freehold, New Jersey 07728 :
..... :

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 January 26, 2023
17-04743

Raymond S. Santiago
.....
Monmouth County Prosecutor

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

THE STATE OF NEW JERSEY

:

Plaintiff,

:

v.

:

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

:

Defendant.

:

SUPERSEDING

Indictment No. 23-0100109

Case No. 17-04743

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 diverse dates between August 3, 2016 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 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.J.S.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

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 diverse dates between August 3, 2016 through August 2, 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: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 diverse dates between August 3, 2016 through August 2, 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.

FOURTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(MANUFACTURE OF CHILD PORNOGRAPHY)

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 diverse dates between August 3, 2016 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 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 or 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.

FIFTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(MANUFACTURE OF CHILD PORNOGRAPHY)

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 diverse dates between August 3, 2016 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 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.

SIXTH COUNT

ENDANGERING THE WELFARE OF A CHILD

(POSSESSION OF CHILD PORNOGRAPHY)

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 August 3, 2016 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 file, videotape, computer program of 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.

SEVENTH 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 diverse dates between August 3, 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 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.

EIGHTH 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 diverse dates between August 3, 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 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.

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 diverse dates between August 3, 2016 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 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.

TENTH 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 diverse dates between August 3, 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 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.

ELEVENTH 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 diverse dates between August 3, 2016 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 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.

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 KUO a/k/a "VICTOR LEE", on or about diverse dates between August 3, 2016 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 Freehol, 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.

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 KUO a/k/a "VICTOR LEE", on or about diverse dates between August 3, 2016 through November 11, 2017, in or about the Township of Marlboro, in the 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.

FOURTEEN 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, County of Hudson, and within the jurisdiction of this Court, did commit the crime of Conspiracy,

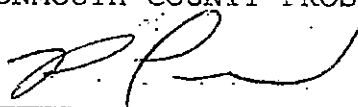
by unlawfully agreeing with another that they, or either one of them, would commit the crime of Evidence Tampering with the purpose or promoting or facilitating the commission of said crime and that in pursuance of such conspiracy and to effect the object thereof, the following overt acts were done:

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.

RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR

By:



RYAN LAVENDER
ASSISTANT PROSECUTOR

Endorsed:

Foreperson