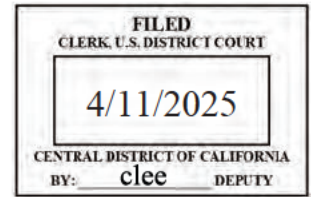


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original



UNITED STATES DISTRICT COURT
for the
Central District of California



United States of America,

Plaintiff,

v.

John Miller, and
Cui Guanghai,
a/k/a "Jack,"

Defendants.

Case No. 2:25-mj-02178-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about October 16, 2023, and continuing to the present, in the county of Los Angeles in the Central District of California, and elsewhere, the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(5)	Stalking
18 U.S.C. § 371	Conspiracy

This criminal complaint is based on these facts:

Please see attached affidavit.

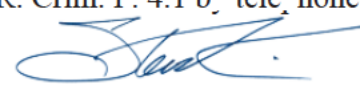
Continued on the attached sheet.

Complainant's signature

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 b, tele. hone.

Date: April 11, 2025



Judge's signature



City and state: Los Angeles, California

Hon. Steve Kim, U.S. Magistrate Judge
Printed name and title

AUSA: Amanda B. Elbogen 

AFFIDAVIT

I, [REDACTED], being duly sworn, declare and state as follows:

I. BACKGROUND OF AFFIANT

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been since April 2023. I am currently assigned to the FBI's Los Angeles Field Division's West Covina Resident Agency office, where I investigate, among other things, cases involving the repression of foreign national dissidents in the United States by foreign state actors, including the People's Republic of China ("PRC"). I completed the Basic Field Training Course in Quantico, Virginia in April 2023 and all subsequent required trainings to enhance my skills. Before becoming a Special Agent, I was employed by the United States Department of Commerce as a Trade and Industry Analyst since August 2021.

II. PURPOSE OF AFFIDAVIT

2. I make this affidavit in support of a complaint and arrest warrant for John Miller ("MILLER") and Cui Guanghai, a/k/a Jack ("CUI") for violations of 18 U.S.C. § 2261A (Interstate Stalking), and 18 U.S.C. § 371 (Conspiracy to violate 18 U.S.C. § 2261A (Interstate Stalking)) (collectively, the "SUBJECT OFFENSES").

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there

is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of our investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

III. STATEMENT OF PROBABLE CAUSE

In the fall of 2023, MILLER and CUI knowingly conspired to stalk, harass, and intimidate a resident of the Central District of California (the "VICTIM") who had publicly criticized PRC President Xi Jinping ("President Xi") and the PRC government. MILLER and CUI used interstate communications platforms to coordinate, facilitate, and direct the harassment scheme, and instructed a third individual to engage in interstate travel to do the same. In particular, between in or around October 2023 and in or around November 2023, MILLER and CUI directed and participated in a scheme to take several harassing, intimidating, threatening, and emotionally-distressing actions against the VICTIM, including directing multiple individuals, whom they believed were associates but were in fact a confidential human source and an undercover agent for the FBI, to install a tracking device on the VICTIM's car, slash the tires of the VICTIM's car, and destroy the VICTIM's artwork, among other conduct. The harassment scheme placed the VICTIM in reasonable fear for his/her safety and the safety of his/her immediate family.

A. Background on MILLER and CUI

4. In or around October 2023, I learned that a confidential human source ("CHS") working for the FBI had been reporting to the FBI that s/he was in direct contact with MILLER for over two years. Through its investigation, the FBI determined that MILLER was a resident and citizen of the United Kingdom and also had status as a Legal Permanent Resident of the United States.

5. During that time, MILLER had tasked the CHS with staging protests in the United States, including a protest in the United States opposing the visiting President of Taiwan in April 2023. MILLER had also tasked the CHS with producing a documentary and internet articles portraying the United States' military and human rights record in a negative light.

6. On or about June 6-7, 2023, the CHS reported to the FBI that MILLER was working for, and being directed by CUI, who is based in the PRC, and whom both MILLER and the CHS believed was working for the PRC government.

7. As detailed below, based on my training and experience, and knowledge of the investigation, I believe that CUI is operating on behalf of the PRC government, and tasks MILLER with passing taskings on to third parties to be performed in the United States on behalf of the PRC government.

B. MILLER and CUI task a CHS with staging a protest in the Los Angeles area against the visiting President of Taiwan

8. According to information provided by the CHS, MILLER had tasked the CHS with staging protests in the United States, including a protest in the Los Angeles area on April 5, 2023 opposing the President of Taiwan's visit to the United States. Below is a photograph from that staged protest.



9. According to information provided by the CHS, CUI and MILLER specifically requested that protest signs include the following messages: "Don't involve us in your war," "Don't let Taiwan become Ukraine 2," "Look after America first," and "We know who is our biggest trading partner." The CHS enlisted a third-party individual to execute the tasking. This individual hired actors to pose as protesters, as well as a videographer to record the protest. After the "protest" took place in downtown Los Angeles, the videographer was instructed to, and did, upload the video of the event to an online storage platform that was

shared with two email addresses - one belonging to MILLER, and the other belonging to CUI.

C. MILLER's 2023 Trip to the PRC

10. On or about June 24, 2023, the CHS reported to the FBI that MILLER returned from a June 2023 trip to China, where he had met with PRC government officials in Beijing and Liaoning, and that MILLER told the CHS that the "trip couldn't have gone better." MILLER claimed to have met with someone whose boss is the Governor of Liaoning Province in China ("PRC National 1"). MILLER told the CHS that PRC National 1 ran fourteen cities in Liaoning province. MILLER also told the CHS that he had met with someone whom MILLER described as CUI's "main guy" in China ("PRC National 2"). MILLER said that PRC National 2 takes work to bigger people inside the PRC government, who "break down doors." MILLER also told the CHS that, toward the end of his trip to the PRC, CUI took MILLER to meet CUI's bosses in Beijing, two people MILLER referred to as "big motherfuckers."

11. MILLER further claimed to the CHS that he had been promoted and that his involvement with the PRC had reached the next stage. According to the CHS, as part of MILLER's trip to China in June 2023, MILLER was tasked by people in the PRC to write a dossier on himself outlining all his capabilities and work to date, which MILLER stated amounted to 35 pages.

D. MILLER tasks the CHS and UCE with retaliating against a Los Angeles resident critical of PRC President Xi Jinping

12. On or about October 2023, an FBI Special Agent in the FBI Milwaukee Field Office informed me that MILLER and CUI had

enlisted the CHS in a plot to prevent the VICTIM from protesting President Xi's visit to the United States for the Asia Pacific Economic Cooperation ("APEC") summit in November 2023.

13. A review of the VICTIM's public social media posts, as translated by an FBI certified linguist, showed the VICTIM had made multiple statements expressing opposition to the policies and actions of the PRC government and President Xi. The VICTIM's social media posts also included pictures of a set of artistic statues depicting President Xi and his wife bare chested, kneeling and with their hands tied behind their backs. The below screenshot from X, formerly known as Twitter, shows the VICTIM's 2023 billboard advertisement in Times Square exhibiting the statues.



14. From public media reporting, I knew that President Xi was scheduled to, and did, visit San Francisco the week of November 16, 2023, to attend the APEC summit. I reviewed posts

on the VICTIM's Twitter account from earlier in November 2023 in which the VICTIM expressed an intent to travel to San Francisco to protest against President Xi outside the APEC summit.

15. According to information provided by the CHS, on or about October 16, 2023, at MILLER's direction, the CHS traveled from an out-of-state location to Los Angeles, California. On October 17, 2023, MILLER instructed the CHS to report back to him with the location of the VICTIM's home. In a recorded phone call, they discussed the apartment number and the appearance of the VICTIM's residence. MILLER requested that the CHS provide a picture of the residence. MILLER told the CHS that CUI wanted the CHS to make an appointment to view the apartment next door to the VICTIM's, and to say that s/he was interested in renting it. In a recorded call, MILLER explained:

MILLER: They were hoping you could put a camera there to watch the guy. Or worst case so they're gonna give money to rent that place for the next couple of months or something so they can monitor the guy. If you obviously cant do it we need to find somebody that maybe wants some free rent to go live somewhere and keep track of that guy.

CHS: How does that make sense if this is all taking place in the next three weeks?

MILLER: No no they want to keep tracks on him even after Xi's gone.

CHS: Oh.

MILLER: Yeah they want to keep on this fucking guy. Xi just happens to be coming. The boss is coming that's it. Apart from that they want to try to get something on him, they want to know what he's doing. You know? They want that apartment if its close enough to him. [CUI] said he sent you the details.

16. Based on my training and experience and the facts developed in this investigation, I believe that MILLER's use of the phrase "the boss" to refer to President Xi demonstrates MILLER's awareness that he was acting at the direction and control of the PRC Government.

17. On October 18, 2023, in a recorded phone call, MILLER told the CHS that he had spoken to CUI, and that CUI was "one hundred percent" sure of the VICTIM's address. MILLER also told the CHS that "the real fucking pay, they're gonna pay, but the real pay day is going to be putting the siding up on that guy. There will be extra cash to play with when that happens." In my training and experience, and based on my knowledge of the investigation, "siding" here means an assault on the VICTIM. In his response, the CHS sought to clarify whether "the snatch" was still an option, referencing an earlier (unrecorded) conversation in which the CHS and MILLER had discussed possibly kidnapping the VICTIM. MILLER responded: "They want it bang bang and gone. No talking to no nothing to like a mugging or something. Take his fucking watch. Take his phone."

18. Later in the same recorded phone call, the following exchange took place:

CHS: Do you care if its bullets versus baseball bat?

MILLER: Um not necessarily. But I think you'd get paid more for bullets. And the guys I spoke to said that's way fucking easier. Apparently they're not so much baseball bat, or like an ice pick is the best way of doing it.

CHS: Okay.

MILLER: On the knees and ankles. Doesn't necessarily have to be bullets. Have him fucked up and have his picture taken. Fucked up. But the guys I've spoken to, the easiest thing is just bam bam bang bang and just walk away. But listen it doesn't have to be that. [UI] ... knees and ankles.

19. Later, in the same recorded phone call on October 18, 2023, the CHS told MILLER, "I am going to go and book a flight." Based on the entirety of their interactions, it was apparent that MILLER understood the CHS did not live in California and had to fly there to accomplish the tasking.

20. Later that day, also in a recorded call, the CHS and MILLER returned to the subject of payment, and the following exchange took place:

CHS: And let's go with your price of 100k and just let me know what happens after that.

MILLER: Well we're not gonna - I'm not gonna - we're holding off on prices for the time being. I've already told him the minimum.

CHS: Okay

MILLER: Minimum. That's why I know we've got at least that budget to work with.

CHS: Yep.

MILLER: But even if everybody wants it we could probably go a bit above that. I suspect these other dudes are gonna come in higher than that. That's the thing. The ones I've talked to, there's too many middle men.

CHS: Is [CUI]'s boss that [PRC National 1]¹ person? Is he dealing with a woman? Is that what this is all about?

¹ Based on my knowledge of this case, I believe the CHS was referring to PRC National 1, described above as a PRC government official in Laoning province.

MILLER: Oh no no no no. She's second in command. And her boss is bang up for it. There's another guy who needs to approve it.

CHS: Okay

MILLER: But they're all bang up for it. As long as it's reasonable. The numbers we talked about I'm pretty sure it's 100%.

21. Later that night, on October 18, 2023, and into the morning of October 19, 2023, in another recorded phone call between MILLER and the CHS, MILLER discussed placing a tracker on the VICTIM's car. MILLER said it was probably best if the CHS placed the tracker on the car in the middle of the night and asked the CHS to take photos. MILLER asked the CHS to make sure to provide the time that each photograph was taken, to which the CHS responded that he was not always looking at the clock and had to estimate the timing. MILLER said: "You're supposed to be so we know what time his movements are. . . . But when you've got the tracker on you could, if you wanted to, follow him on the app so you know where he is. . . I mean exactly how what his movements are." Later, also on a recorded phone call, MILLER instructed the CHS to say that he/she was CUI's friend when the CHS picked up the payment for the job.

22. On October 19, 2023, in a recorded phone call, the CHS informed MILLER that he had enlisted an associate in Los Angeles who could assist their efforts to harass or injure the VICTIM. This individual was in fact an FBI undercover agent (the "UCE"). The CHS and MILLER had the following exchange, and the CHS broached the topic of how much to explain to the UCE:

CHS: Okay. I'll share a little more information with him and make sure he's okay with it. And I mean details meaning like I haven't said to him, like, exactly what they're looking for. But I have said he's a person of interest, he's kind of scummy, he owes some money, and there will be a big pay day for him if he sends this guy a message. Is what I said.

MILLER: Okay. Yeah yeah. The message is, you're not walking.

CHS: Yeah.

MILLER: That's the message. . . . So they're not mobile for a while. . . . That's sort of the extreme message.

23. Later in that same recorded phone call, the CHS sought to confirm the "cover story" with MILLER so that the CHS could explain the tasking to the UCE:

CHS: Okay so are you - are you okay with me explaining why [the VICTIM] needs to be taken out? Or just like, do you want that to be a cover story? What do you want here?

MILLER: He owes money.

CHS: Okay.

MILLER: Yeah just he owes a lot of money. And they want him to just not walk on his own for a little while.

CHS: So nothing about statues or China or anything?

MILLER: No none of that. I mean obviously when he goes up there they're looking for statues.

CHS: Yeah that's why I'm asking.

MILLER: Cuz he's going to be looking to see if they're in the warehouse. Just say it's a long story and they're trying to find-

CHS: Right. He's pretty smart, [the UCE]. He's pretty cunning and stuff so there is a chance that he might - not put two and two together but be like, "What's with the statues? Why are these important?" And I'm just going to

have to be like what are they stolen or expensive or what's the deal here? Like-

MILLER: Uh that you don't know. You haven't been told on that level. You just know they're important.

CHS: Right.

MILLER: They're significant. He needs to know where they are. Because I mean somebody probably wants to steal them.

CHS: Okay.

MILLER: So we need to locate them. You know, issue number one is he-

CHS: Yeah.

MILLER: -needs to be incapacitated. But I mean too they do want to find those statues because they're going to want to try to get a hold of them.

24. On October 19, 2023, at MILLER's direction, the CHS traveled to a home in West Covina, California (the "West Covina residence") and obtained \$2,000 from an individual (the "West Covina individual").

25. On or about October 20, 2023, in a recorded phone call, MILLER told the CHS that he still needed to obtain confirmation before authorizing the plan to shoot or injure the VICTIM:

MILLER: The siding. That still has to be confirmed. I mean sanctioned. Um because, it's only his people who will come up for this. They still gotta run it by the big shot. And he might turn it down anyway.

CHS: Oh. Who's the big shot?

MILLER: It's gotta be sanctioned by somebody. And there's a chance he'll say no. They don't usually do this kind of thing normally.

CHS: Who's the big shot? I don't know who you mean by that.

MILLER: Probably somebody from Beijing.

CHS: Oh Okay like-

MILLER: The big boss.

26. Later in the same recorded phone call, MILLER then offered to explain the tasking to the UCE directly, stating:

MILLER: And I'll explain that this whole thing isn't sanctioned yet. I'm just gonna say middle management suggested we do it this way. The knees or something so that he can't fucking walk or drive for a while.

CHS: Right.

MILLER: And that's the thing. It's the message they give. You know? We're gonna make sure you're not fucking walking. We're gonna put you in a wheelchair for three fucking months or something. That's what I'll say. That's it. It's their signature.

27. Later, in the same recorded phone call, MILLER reiterated the "message" that he wanted the CHS to send to the VICTIM:

MILLER: That's the most important thing. So best option is take out, you know, the bottom section. And if you could do an extra fucking, extra bit of damage a little higher up that's great too. The message has to be you ain't walking for a little while motherfucker. Not giving him brain damage. Just lower body damage.

CHS: And leave a fortune cookie so they know it was a China man right?

MILLER: Oh no they don't want any connection to a China man.

CHS: Oh. Leave leave uh a pork rind.

MILLER: Yeah, yeah, yeah . . . make it look like a mugging.

CHS: Right

MILLER: And there'd be another message coming. But once that job's done, we're out.

CHS: What's the other message?

MILLER: Well someone else will talk to him after. Like see what can happen to you? Same thing will happen if you don't stop doing what you're doing.

CHS: Oh.

MILLER: Maybe it'll happen to your son next. You see how easy it was for us to get to you?

. . .

CHS: I still think this is fucking overkill. Like the guy put statues and protested. You know what I mean?

MILLER: Oh absolutely fucking overkill.

CHS: Yeah.

MILLER: Absolutely. And they don't really care what he does. Um but it's all about what the big fella wants. It's all about face.

28. That same day, in a recorded phone call, the CHS introduced MILLER to another individual, the UCE, whom the CHS told MILLER was an associate in Los Angeles who could assist their efforts to harass or injure the VICTIM. In a recorded phone call with the CHS and the UCE, MILLER instructed them to install a tracking device on the VICTIM's car.

29. In another recorded call, MILLER told the CHS and UCE that the next payment would most likely be in cash, and that the

amount would be tied to the specific action ultimately taken to prevent the VICTIM from traveling to San Francisco. MILLER reiterated that the "generals" in the PRC "have to approve" the tasking before it could be commenced.

E. November 6, 2023: MILLER Tells the CHS He is Awaiting Approval from the "Big Boss" in Beijing

30. On or about November 6, 2023, MILLER had a recorded phone call with the CHS about the status of the "siding" tasking. MILLER indicated that he was awaiting direction before instructing the CHS to take a specific action, stating: "they had to run it by the big boss . . . who I think is in Beijing."

31. Later that day, MILLER had another recorded phone call with the CHS in which MILLER told the CHS that he had spoken with CUI about the potential plan to shoot or otherwise harm the VICTIM, and that CUI had told him, "The head guy said no . . . They don't do that, they are not Russian," but that "they want the fucking statues." MILLER also told the CHS, "I'll send you some money for [the UCE] this week."

32. In that same call, MILLER explained to the CHS that he might have another job for when "the boss" comes to town, along the lines of a staged protest or demonstration.

F. November 10, 2023: PRC Officials Visited the VICTIM's Parents in the PRC

33. Based on conversations with the VICTIM, s/he believed that PRC government officials had visited his/her parents' house in the PRC on November 10, 2023, to intimidate the VICTIM. On November 14, 2023, the VICTIM called a number that was given to him/her by his/her parents following that visit. The person who

picked up identified himself as a PRC government official, and asked why the VICTIM was going to San Francisco, and about the VICTIM's online activity.

G. November 13-17, 2023: MILLER Directs the UCE to Slash the VICTIM'S Tires to Prevent the VICTIM From Traveling to San Francisco to Protest President Xi

34. On or about November 13, 2023, MILLER sent the UCE a phone number and address (the West Covina Residence) and said they belonged to a person, the West Covina individual, who would pay the UCE to carry out the tasking of preventing the VICTIM from traveling to San Francisco. MILLER instructed the UCE to call the number and to introduce himself/herself as CUI's friend.

35. MILLER then wrote to the UCE requesting that the UCE send him a photograph of the VICTIM and his/her car, "so we can provide a daily update to the client."

36. Later that day, MILLER messaged the UCE: "What time do you think you can get the report to me. I know they have a progress meeting in the morning and it would be good if we can get something to them. It's 6am over there now. Have you managed to locate [the VICTIM] or any of the vehicles?"

37. The UCE responded stating that the UCE was surveilling the VICTIM, and told MILLER that the UCE had called and texted the number MILLER had provided, but had not gotten an answer. MILLER responded, "If you don't reach him I will call CUI in 90 minutes, he should be awake then."

38. Later that day, at approximately 4:04 P.M. Pacific Standard Time ("PST") on November 13, 2023, MILLER confirmed to

the UCE that he had spoken to CUI, who had called the West Covina individual and told him to make contact with the UCE.

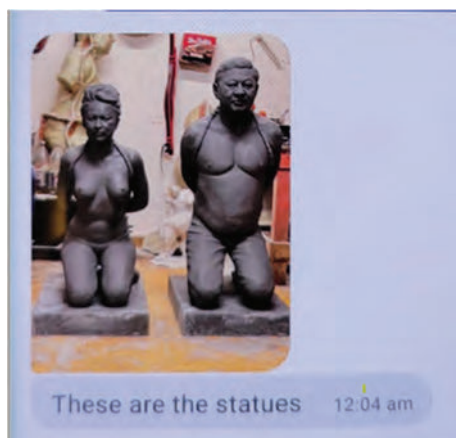
39. At approximately 7:30 P.M. PST that night, the UCE went to the West Covina Residence and approached the front door. A few minutes later, the West Covina Residence garage door opened and an individual walked outside and handed the UCE \$10,000 in U.S. currency.

40. At approximately 7:46 P.M. PST, the UCE messaged MILLER: "Got the cash, all good."

41. At approximately 10:09 P.M. PST, MILLER repeated his request to the UCE to take more photographs of the VICTIM, writing: "I need something asap bud, they are in a meeting and I need to provide an update. They have just called me chasing it."

42. At approximately 11:15 P.M. PST, MILLER again requested photographs: "Buddy please send me an update with pics. His phone is being tracked and they say he is on the move to San Mateo. Please confirm."

43. The next day, on November 14, 2023, MILLER exchanged multiple messages with the UCE. At approximately 12:04 A.M.



PST, MILLER sent the UCE a photograph of the statues he wanted the UCE to destroy.

44. At approximately 12:30 A.M. PST, the UCE sent MILLER a photograph of the VICTIM's car to confirm that the UCE had slashed the tires, and verify the VICTIM was still home. MILLER responded and reiterated his request for pictures of the VICTIM.

45. At approximately 10:12 A.M. PST on November 14, 2023, MILLER wrote to the UCE:

[CUI] and I are the only ones who know about the tyres and we've decided not to take ownership, as far as anyone is concerned it wasn't us. Our people noticed a couple of young Chinese guys on each side of the car in the middle of the night and it looks like they slashed some tyres.

BUT IT WASN'T US

it's definitely going to complicate things because he will now be on his guard. We still think he will go to the lock up to get the statues, a good result would be to follow them in and give them a few slaps and remove the heads as evidence.

46. At approximately 11:46 A.M. PST on November 14, 2023, MILLER wrote to the UCE:

Keep me updated on anything you think is relevant, like especially if he moves anywhere. [CUI]'s team have decided they will stay up all nigh [sic] in case there are any developments, he's driving me nuts. He's a great guy and like a brother to me but his people are like a cat in a hot tin roof because the big boss is in SF tomorrow, this is a big thing for them.

47. At approximately 3:16 P.M. PST on November 14, 2023, MILLER wrote to the UCE: "No movement from our guy bud?" The UCE responded "Nothing, inside all day, tires still flat." MILLER responded with a thumbs up emoji.

48. At approximately 4:17 P.M. PST on November 14, 2023, the UCE sent the following photograph to MILLER of the VICTIM's car with the tires "slashed." In fact, the FBI had deflated the tires on the VICTIM's car, with the VICTIM's consent.



49. On November 15, 2023, MILLER sent the following message to the UCE:

Someone from the Chinese Embassy has been talking to [the VICTIM's] son on Wechat and [the VICTIM] isn't going to SF

The strategy has changed, now they do want someone to talk to him and offer to buy the statues from him, offer him \$2-3k to give them up and explain its in his best interests, a bit like in the godfather it's an offer he can't refuse

Call me when you can

They will arrange the extra cash

50. On November 16, 2023, at approximately 5:06 A.M. PST, MILLER sent a message: "Morning buddy, do you think you can get you're [sic] guy to make an offer for the statues? We need to do this today or it's off the table." The UCE responded that

his friend could go make the offer to purchase the statues that day. MILLER then confirmed that the UCE would be paid for his efforts.

51. On November 16, 2023, the FBI, to further the investigation and with the VICTIM's consent, took custody of the statues, reimbursed the VICTIM for their cost, destroyed them, and recorded their destruction. The UCE then told MILLER that his associate had taken custody of the statues.

52. On Nov 16, 2023, at approximately 12:51 P.M. PST, MILLER responded:

Money is being sorted, I'll notify you when cleared to call him

They are pleased as fuck

We will need a video of them when your guy gets to his ware house and capture them being destroyed

53. Several hours later, when the UCE had still not sent MILLER the video that MILLER had requested, MILLER wrote to the UCE:

Ask your guy to get the video done as soon as possible so that they have it first thing in their morning.

They will be breaking out the fucking noodles

Yes hah

I mean yeee haaaa

54. At approximately 1:45 P.M. PST on November 16, 2023, MILLER told the UCE he could collect his payment from the same contact in West Covina the UCE had gone to previously:

Call me when you're free, you can collect the package after 8:00 tonight

Go to the same place after 8:00 and call him

Need the video as soon as your friend can sort it

55. At approximately 1:51 P.M. PST on November 16, 2023, the UCE wrote to MILLER asking if he could wait to destroy the statues. MILLER responded:

We absolutely need to show them a video of them being destroyed today bud

That was the job

We cannot delay it they are waiting for it

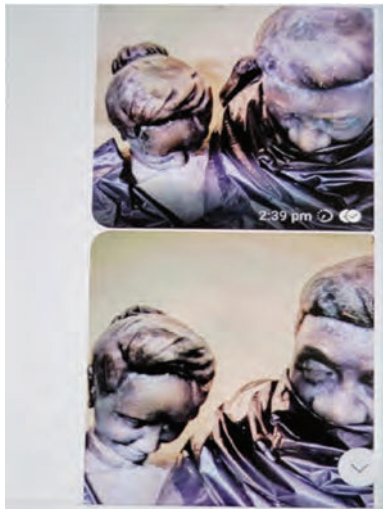
56. The UCE responded that he would "just smash them then," to which MILLER replied:

Show them I [sic] current state and video and picture them smashed up, it's important we do this within the next couple of hours.

So they get the video and pics [first] thing in the morning for them

They have been sweating on this

57. At approximately 2:39 P.M. PST, the UCE sent MILLER the following photographs to confirm s/he had possession of the statues:



58. MILLER responded at approximately 3:02 P.M. PST, "I get you but they have to be destroyed [so] they can't be used. Also we need to keep the eyes on him until noon tomorrow because there is another pair of these statues." The following exchange then took place:

UCE: Yup, as agreed, eyes on him till plane takes off

MILLER: Cool buddy

UCE: His car is still on flat tires... He hasn't left his house since the tires

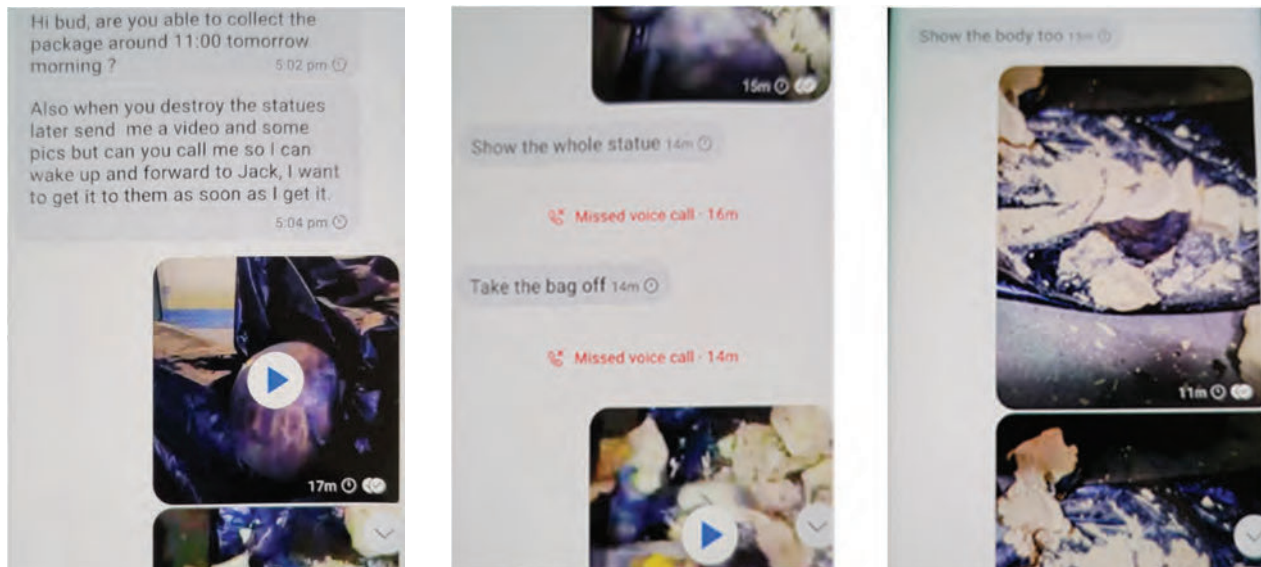
MILLER: I think the msg did the trick

UCE: I think he really got scared

MILLER: He is shitting himself

59. On November 16, 2023, at approximately 5:00 P.M. PST, the UCE sent a video and photographs to MILLER depicting the statues being destroyed. The screenshots below depict MILLER's

requests regarding the video evidence, for example, "Show the whole statue," "Take the bag off," and "Show the body too."



60. On or about November 17, 2023, the UCE texted the same West Covina individual who had provided prior payments to arrange the pick-up of the next payment that evening at the West Covina Residence.

61. At around 7:25 P.M. PST on or about November 17, 2023, the UCE went to the West Covina Residence. The West Covina individual exited from the garage door of the West Covina Residence and handed the UCE \$5,000 in U.S. currency.

H. February-March 2025: CUI and MILLER Task the UCE With Further Harassing Activities

62. Based on my discussions with FBI Special Agents in Milwaukee, I know that on February 27, 2025, MILLER called the UCE to say that there was an individual in the Los Angeles area who had a 24-hour live online feed of statues that were of interest to the PRC. MILLER tasked the UCE with locating the

individual with the statues - the same VICTIM they had harassed in 2023 - and offering the VICTIM a payment to stop displaying the statues online. MILLER provided a specific address in Corona, California (the "Corona Address"), as the address where the statues were located.

63. On February 28, 2025, FBI conducted physical surveillance at the Corona Address. Based on my conversations with the surveilling agent, I know the agent observed a store front next to this address that had a door with a security screen and two windows on both sides. The window on the right side was boarded up with plywood.

64. Based on my review of a police report obtained from the Corona Police Department, I know that the window had been shattered three days earlier, on February 25, 2025, by two males in a reported attempted burglary.

65. The surveilling agent also observed a statue behind the glass which appeared to depict a man on his knees with his hands behind his back. The statue is consistent with the statue depicting President Xi owned by the VICTIM.

66. Review of publicly available social media posts revealed that the VICTIM had publicly announced the online exhibition of the statues and indicated the official opening day of the exhibition was slated to be March 5, 2025.

67. Based on conversations with FBI Special Agents in Milwaukee, I learned that in conversations between MILLER and the UCE, MILLER had told the UCE that the task needed to be

completed by March 3, 2025, and that CUI was sending \$10,000 for the UCE to pick up upon completion of the tasking.

68. I reviewed screenshots of text messages between the UCE and CUI, which showed that CUI provided the UCE with the address for the West Covina Residence and the 0856 Number as the contact information for the West Covina individual, who would give the UCE the \$10,000.

69. On or about March 6, 2025, another FBI UCE ("UCE-2") contacted the West Covina individual at the 8056 Number to schedule a time for the pick-up of the \$10,000. That same day, I and another FBI Special Agent conducted surveillance in the vicinity of the West Covina residence.

70. At around 4:25 PM on March 6, 2025, UCE-2 arrived at the West Covina residence. The West Covina individual walked out of the garage door of the West Covina residence and handed UCE-2 \$10,000 in cash.

IV. CONCLUSION

71. For the foregoing reasons, I respectfully submit there is probable cause to believe that MILLER and CUI violated 18 U.S.C. § 2261A (Interstate Stalking), and 18 U.S.C. § 371 (Conspiracy to Violate 18 U.S.C. § 2261A (Interstate Stalking)).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 11th day of
April, 2025.

A handwritten signature in blue ink, appearing to read "Steve Kim", written over a horizontal line.

HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE