



1 NICOLA T. HANNA
United States Attorney
2 PATRICK R. FITZGERALD
Assistant United States Attorney
3 Chief, National Security Division
JOHN J. LULEJIAN (Cal. Bar No. 186783)
4 Assistant United States Attorney
1200 United States Courthouse
5 312 North Spring Street
Los Angeles, California 90012
6 Telephone: (213) 894-0721
Facsimile: (213) 894-0141
7 E-mail: John.Lulejian@usdoj.gov

8 Attorneys for Plaintiff
UNITED STATES OF AMERICA
9

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 IN THE MATTER OF THE
13 EXTRADITION OF

14 ADRIAN HONG CHANG,
aka "Adrian Hong,"
15 aka "Oswaldo Trump,"
aka "Matthew Chao,"

16 A Fugitive from the
17 Government of the
Kingdom of Spain.

No. **19MJ 01449**
COMPLAINT

FOR PROVISIONAL ARREST WITH
A VIEW TOWARDS EXTRADITION
(18 U.S.C. § 3184); ORDER THEREON

(FILED UNDER SEAL)

18
19 TO: Honorable Jacqueline Chooljian
United States Magistrate Judge
20 Central District of California

21 I, JOHN J. LULEJIAN, being duly sworn, depose and state that I
22 am an Assistant United States Attorney for the Central District of
23 California and act for the United States in fulfilling its
24 obligations to the Government of the Kingdom of Spain pursuant to the
25 Treaty on Extradition between the United States of America and Spain,
26 U.S.-Spain, May 29, 1970, 22 U.S.T. 737; the Supplementary Treaty in
27 Extradition between the United States of America and Spain, signed
28 January 25, 1975; the Second Supplementary Extradition Treaty between

1 the United States of America and the Kingdom of Spain, U.S.-Spain,
2 Feb. 9, 1998, S. Treaty Doc. No. 102-24 (1992); the Third
3 Supplementary Treaty between the United States of America and the
4 Kingdom of Spain, U.S.-Spain, Mar. 12, 1996, S. Treaty Doc. No. 105-
5 15 (1997); and the Instrument on Extradition between the United
6 States of America and Spain, as contemplated by Article 3(2) of the
7 Agreement on Extradition between the United States and the European
8 Union signed 25 June 2003, as to the application of the Treaty on
9 Extradition between the United States of America and Spain signed May
10 29, 1970, and the Supplementary Treaties on Extradition signed
11 January 25, 1975, February 9, 1988 and March 12, 1996, U.S.-Spain,
12 Dec. 17, 2004 S. Treaty Doc. No. 109-14 (2006), with Annex
13 (collectively the "Treaty"), with respect to the fugitive, ADRIAN
14 HONG CHANG, also known as ("aka") "Adrian Hong," aka "Oswaldo Trump,"
15 aka "Matthew Chao" ("HONG CHANG").

16 In accordance with Title 18, United States Code, Section 3184, I
17 charge on information and belief as follows:

18 1. That Article XI of the Treaty provides for the provisional
19 arrest and detention of alleged fugitives pending the submission of a
20 formal request for extradition and supporting documents.

21 2. That in accordance with Article XI of the Treaty, the
22 Government of the Kingdom of Spain ("Spain") has asked the
23 United States for the provisional arrest of HONG CHANG with a view
24 towards his extradition.

25 3. That according to the information provided by the
26 Government of Spain, HONG CHANG is being prosecuted for the following
27 offenses:
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1 a. Breaking and Entering, in violation of Articles 202
2 and 203 of the Spanish Penal Code;

3 b. Illegal Restraint, in violation of Articles 163 and
4 165 of the Spanish Penal Code;

5 c. Threats, in violation of Articles 169 and 171 of the
6 Spanish Penal Code;

7 d. Robbery with Violence and Intimidation, in violation
8 of Articles 237, 241, and 242 of the Spanish Penal Code;

9 e. Causing Injuries, in violation of Article 147 of the
10 Spanish Penal Code;

11 f. Falsifying a Document, in violation of Articles 390
12 and 392 of the Spanish Penal Code; and

13 g. Being a Member of Criminal Organization, in violation
14 of Article 570 bis of the Spanish Penal Code.

15 4. That on or about April 2, 2019, Judge Jose de la Mata Amaya
16 of the Central Court of Investigation No. 5, National High Court, in
17 Madrid, Spain, issued a warrant for HONG CHANG's arrest.

18 5. That the offenses for which HONG CHANG's provisional arrest
19 are sought were committed within the jurisdiction of Spain and are
20 covered by Article II of the Extradition Treaty.

21 6. That the warrant was issued on the basis of the following
22 facts:

23 a. On or about February 7, 2019, HONG CHANG visited the
24 Embassy of the Democratic People's Republic of North Korea in Madrid,
25 Spain ("the Embassy"). While there, HONG CHANG, posing as a
26 businessman named "Matthew Chao," spoke with Y.S.S., the Embassy's
27 Chargé d'affaires.

1 b. Approximately two weeks later, on or about
2 February 22, 2019, at approximately 5:00 p.m., as recorded on a
3 surveillance camera, HONG CHANG, called at the door of the Embassy,
4 and again asked to see Y.S.S. At the time, S.J.C., H.R.Y., and
5 S.G.J. were working in the Embassy's garden. S.J.C. opened the door,
6 allowed HONG CHANG to enter the Embassy grounds, and asked him to
7 wait on a bench in the patio while he went to find Y.S.S.

8 c. When S.J.C. stepped away to find Y.S.S., HONG CHANG
9 opened the door and allowed six individuals carrying knives, iron
10 bars, machetes, and imitation handguns (collectively, "HONG CHANG's
11 group") to enter the Embassy grounds. Members of HONG CHANG's group
12 struck S.J.C., H.R.Y., and S.G.J., restrained them using shackles and
13 cables, placed a bag over S.J.C.'s head, and took the three men to
14 the Embassy's meeting room. Members of HONG CHANG's group also
15 attacked and hit Y.S.S., and took him to a bathroom where they tied
16 his hands behind his back, placed a bag over his head, and threatened
17 him with iron bars and imitation handguns. Approximately, 30 minutes
18 later, members of HONG CHANG's group took Y.S.S. to the Embassy's
19 meeting room to join the other captives.

20 d. At the time of the attack, Y.S.S.'s wife and their
21 eight-year-old son were in a locked bedroom. Members of HONG CHANG's
22 group forced the locked door open and entered the bedroom. Although
23 they did not restrain Y.S.S.'s wife or son, a member of HONG CHANG's
24 group remained on guard to prevent either of them from leaving.

25 e. At the time of the attack, S.G.J.'s wife was on the
26 top-floor of the Embassy, and hearing the commotion downstairs, she
27 locked herself inside a room. When she heard hammering at the locked
28 door, S.G.J.'s wife attempted to escape via the room's terrace, but

1 in doing so, fell to the ground. Despite sustaining various
2 injuries, she was able to leave the Embassy compound. Once she was
3 on the street, a passerby helped her and requested police and medical
4 assistance.

5 f. When the police arrived, S.G.J.'s wife told them about
6 the attack on the Embassy. After establishing a security perimeter,
7 three police officers approached the Embassy and knocked on the front
8 door. HONG CHANG, wearing a pin bearing the face of the North Korean
9 president on his jacket lapel and representing himself as a person in
10 authority at the Embassy, answered the door. HONG CHANG informed the
11 police that there was no problem in the Embassy and that if a person
12 of North Korean nationality had been injured, the police needed to
13 inform the Consulate officially.

14 g. Inside the Embassy, three members of HONG CHANG's
15 group took Y.S.S. to the basement. Two of the members of HONG
16 CHANG's group identified themselves as belonging to a human rights
17 association or movement for the liberation of North Korea and urged
18 the captive Chargé d'affaires to leave North Korea. When Y.S.S. told
19 them that he would not betray or desert his country, all but one of
20 the members of HONG CHANG's group left the basement. Shortly
21 thereafter, members of HONG CHANG's group tied up Y.S.S. and placed a
22 bag over his head.

23 h. For several hours, the captives inside the Embassy,
24 except for Y.S.S.'s wife and son, remained bound. At times, members
25 of HONG CHANG's group struck the captives. Members of HONG CHANG's
26 group also systematically searched the Embassy. During the search,
27 they seized a couple of pen drives, two computers, two hard drives
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1 (one of which was used for storing images from the security cameras)
2 and a mobile telephone.

3 i. At approximately 9:40 p.m., five of the members of
4 HONG CHANG's group left the Embassy in three Embassy vehicles.
5 Spanish authorities later found these vehicles abandoned at different
6 locations in Madrid.

7 j. HONG CHANG, using the alias "Oswaldo Trump," arranged
8 for an Uber to take him to nearby Toledo, Spain. At approximately
9 9:30 p.m., the requested Uber parked near police in front of the
10 Embassy. However, at approximately 9:40 p.m., "Oswaldo Trump"
11 cancelled his Uber service. Approximately six minutes later,
12 "Oswaldo Trump" booked a new Uber service with a pick-up at an
13 address near the rear of the Embassy. HONG CHANG and the remaining
14 member of his group left the Embassy through the rear.

15 k. At approximately 9:50 p.m., three North Korean
16 students approached the Embassy. When one of the students called at
17 the front door and received no response, he jumped over the fence and
18 went to assist the captives, most of whom still were tied up.
19 Shortly thereafter, Y.S.S. allowed the police to enter the Embassy
20 premises and investigate the incident. Adjacent to the rear of the
21 Embassy, the police discovered an Italian identity card in the name
22 "Matthew Chao," bearing a photograph of a person resembling HONG
23 CHANG, which Spanish authorities have determined is a forgery. In
24 addition, the police discovered four machetes, imitation pistols,
25 cable ties, and defensive spray. Spanish authorities have determined
26 that HONG CHANG purchased the items from a store in Madrid that sells
27 defense and security equipment on the morning of the Embassy attack.
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1 1. The following day, February 23, 2019, HONG CHANG
2 arrived in the United States from Lisbon, Portugal. Spanish
3 authorities determined that on that same day, "Oswaldo Trump" used an
4 Uber service to travel from Newark Liberty International Airport in
5 New Jersey to New York.

6 m. On February 27, 2019, HONG CHANG met with
7 representatives from the Federal Bureau of Investigation ("FBI") in
8 New York. During that meeting, HONG CHANG admitted that he, with
9 others, had carried out the raid on the North Korean Embassy in Spain
10 days before. HONG CHANG also provided details of the attack.
11 However, HONG CHANG claimed that he and the other individuals were
12 carrying, but did not display, knives and Airsoft pistols. He also
13 turned over to the FBI items seized from the Embassy.

14 7. That I am informed and believe that HONG CHANG is a Mexican
15 national and a Legal Permanent Resident of the United States.
16 According to records obtained by Spanish authorities, "Adrian Hong"
17 stayed at a hotel in Madrid, presented a Mexican passport
18 (No. *****1009) as identification, and paid his bill with an American
19 Express card associated with what appears to be a business address in
20 Los Angeles, California. Hotel security images show HONG CHANG at
21 the hotel. Following the Embassy attack, "Adrian Hong" did not
22 return to the hotel, but instead contacted the hotel and requested
23 that they send his belongings to an address in Los Angeles,
24 California, that he claimed was his residence. HONG CHANG later
25 contacted the hotel and said that someone would pick up his
26 belongings on February 26, 2019.

27 8. Although HONG CHANG has not revealed his current
28 whereabouts to law enforcement, law enforcement has determined that

1 HONG CHANG resides at an address in Los Angeles different than the
2 residential address that he gave to the hotel. According to the
3 California Department of Motor Vehicles, HONG CHANG's California
4 Driver's License (Number ****9764) lists his address as one
5 identified by law enforcement. Public database searches also confirm
6 that this second address is a residence associated with HONG CHANG.
7 Further, on or about April 9, 2019, law enforcement saw HONG CHANG at
8 this second address. Accordingly, law enforcement believes that HONG
9 CHANG may be found within the Central District of California.

10 9. That the Government of the Spain has represented that it
11 will submit a formal request for extradition supported by the
12 documents specified in the Extradition Treaty, within the time
13 required under the Extradition Treaty.

14 10. That HONG CHANG would be likely to flee if he learned of
15 the existence of a warrant for his arrest.

16 WHEREUPON, complainant requests that a warrant be issued, based
17 on probable cause, pursuant to Title 18, United States Code,
18 Section 3184, for the arrest of HONG CHANG and the extradition treaty
19 between the United States and Spain, and that this complaint and the
20 warrant be placed under the seal of the Court, except as disclosure

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2 is needed for its execution, until such time as the warrant is
3 executed.

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5 DATED: This 9th day of April, 2019, at Los Angeles, California.

6 Respectfully submitted,

7 NICOLA T. HANNA
8 United States Attorney

9 PATRICK R. FITZGERALD
10 Assistant United States Attorney
11 Chief, National Security Division

12 1s/
13 JOHN J. LULEJIAN
14 Assistant United States Attorney

15 Attorneys for Complainant
16 UNITED STATES OF AMERICA

17 Subscribed and sworn to before
18 me this 9th day of April, 2019.

19 JACQUELINE CHOOLJIAN

20 UNITED STATES MAGISTRATE JUDGE
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1 UNITED STATES DISTRICT COURT

2 FOR THE

3 CENTRAL DISTRICT OF CALIFORNIA

4 IN THE MATTER OF THE
5 EXTRADITION OF

6 ADRIAN HONG CHANG,
7 aka "Adrian Hong,"
8 aka "Oswaldo Trump,"
9 aka "Matthew Chao,"

10 A Fugitive from the
11 Government of the
12 Kingdom of Spain.

No. 19MJ01449
WARRANT OF ARREST

[Pursuant to 18 U.S.C. § 3184]

(FILED UNDER SEAL)

11 To any United States Marshal or other authorized officer:

12 You are hereby commanded to arrest ADRIAN HONG CHANG, also known
13 as ("aka") "Adrian Hong," aka "Oswaldo Trump," aka "Matthew Chao" and
14 bring him forthwith before the nearest available United States
15 Magistrate Judge to answer a complaint charging him with being
16 subject to extradition to the Kingdom of Spain ("Spain") pursuant to
17 a warrant of arrest in Spain for (1) Breaking and Entering, in
18 violation of Articles 202 and 203 of the Spanish Penal Code;
19 (2) Illegal Restraint, in violation of Articles 163 and 165 of the
20 Spanish Penal Code; (3) Threats, in violation of Articles 169 and 171
21 of the Spanish Penal Code; (4) Robbery with Violence and
22 Intimidation, in violation of Articles 237, 241, and 242 of the
23 Spanish Penal Code; (5) Causing Injuries, in violation of Article 147
24 of the Spanish Penal Code; (6) Falsifying a Document, in violation of
25 Articles 390 and 392 of the Spanish Penal Code; and

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27 \\
28

(7) Being a Member of Criminal Organization, in violation of Article 570 bis of the Spanish Penal Code.

4/9/19
DATE

JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE

RETURN
JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE

Received _____, 2019, at _____, and executed by
arrest of _____, at _____, on _____.
Dated: _____, 2019 _____ District of _____.

By: _____
Title: _____