

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : HON.
: :
: Criminal No. 23-
v. : :
: Count One
ERICK SOLIS : 18 U.S.C. §§ 2252A(a)(3)(B)(ii) and (b)(1)
: (Solicitation of Child Pornography)
: :
: Count Two
: 18 U.S.C. §§ 2252A(a)(5) and 2
: (Possession of Child Pornography)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE
(Solicitation of Child Pornography)

From in or around July 2020 through in or around August 2020, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

ERICK SOLIS,

did knowingly solicit, and did attempt to solicit, using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, any material and purported material in a manner that reflected the belief, and that was intended to cause another to believe, that the material and purported material was, and contained, an obscene visual depiction of a minor engaging in sexually explicit conduct and a visual depiction of an actual minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252A(a)(3)(B) and (b)(1), and Section 2.

COUNT TWO

(Possession of Child Pornography)

On or about January 20, 2022, in Hudson County, in the District of New Jersey and elsewhere, in the District of New Jersey and elsewhere, the defendant,

ERICK SOLIS,

did knowingly possess and attempt to possess, a book, magazine, periodical, film, videotape, computer disk, and other material that contained images and videos of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2), and Section 2.

FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant ERICK SOLIS of the offenses in violation of 18 U.S.C. § 2252A charged in Counts 1 and 2 of this Information, the United States will seek forfeiture, in accordance with 18 U.S.C. § 2253, of all right, title and interest of the defendant in the following:

- (a) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of 18 U.S.C. Part I, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts 1 and 2 of this Information, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property.

2. The property subject to forfeiture includes, but is not limited to, the following property seized from the defendant's residence on or about January 20, 2022:

- (a) One Apple iPhone 13 Pro Max, Model A2484, MLKR3LL/A, bearing serial number R199C2T7V3;

- (b) one Toshiba laptop, Model Qosimio G55-Q802, bearing serial number 88078312H, containing Samsung Solid State Drive (SSD), Model 840 Evo, bearing serial number S1D9NSAF917312L;
- (c) one Apple laptop, Macbook Pro, Model A1286, bearing serial number CC02GF04CDV7M;
- (d) one Sony camera, Model a6000, bearing serial number 6394125, containing SanDisk Secure Digital (SD) Card, 16GB, bearing serial number BL1120422027G;
- (e) one Western Digital Hard Disc Drive (HDD), Model WD5000BEVT-11ZAT0, bearing serial number WXN908NA0582;
- (f) one Western Digital SSD, Model MyPassport NL-2132, bearing serial number 172428422236;
- (g) one Samsung SSD, Model 850 Evo MZ-75E500, bearing serial number S2RANX0J119609K;
- (h) one Samsung SSD Non-Volatile Memory Express (NVMe), bearing serial number S4LN058A0-1;
- (i) one MicroCenter SDXC card, bearing serial number API106ISO5G128M;
- (j) one Silver and blue Universal Serial Bus (USB) thumb drive, with no model or serial number, labeled as “RAM Research Aligned Membership;”
- (k) one SanDisk USB thumb drive, Model CruzerGlide SDCZ60-008G, bearing serial number BI160625230B; and
- (l) one white metal, custom gaming computer tower with no identifying numbers, missing both of the side panels, with damages to the front and rear, that contains unidentified NVMe solid state drive M.2 format.

Substitute Assets Provision
(Applicable to All Forfeiture Counts)

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty.

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


PHILIP R. SELLINGER
United States Attorney