

2015R00298/MMW

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
: :  
v. : Criminal No. 16- 127-FLW  
: :  
JONATHAN SOTO, : 18 U.S.C. §§ 2251(a), 2251(e)  
a/k/a "Chronos" : 18 U.S.C. § 2252A(a)(5)(B)  
: 18 U.S.C. § 2

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at  
Newark, charges:

**COUNT ONE**  
**(Conspiracy to Produce Child Pornography)**

From on or about July 22, 2014 through on or about April 14, 2015,  
in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JONATHAN SOTO,  
a/k/a "Chronos,"

did knowingly and intentionally conspire and agree with others to employ, use,  
persuade, induce, entice, and coerce a minor to engage in sexually explicit  
conduct for the purpose of producing a visual depiction of such conduct, which  
visual depiction was produced using materials that were mailed, shipped, and  
transported in and affecting interstate and foreign commerce by any means,  
including by computer, contrary to Title 18, United States Code, Section 2251(a).

In violation of Title 18, United States Code, Section 2251(e)

**COUNT TWO**  
**(Possession of Child Pornography)**

On or about April 15, 2015, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JONATHAN SOTO,  
a/k/a "Chronos,"

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which were 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, Section 2252A(a)(5)(B) and Section 2.

**FORFEITURE ALLEGATIONS**

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction of one or both of the offenses set forth in Counts One and Two of this Indictment, the defendant,

**JONATHAN SOTO,  
a/k/a "Chronos,"**

shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 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 Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

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

a. cannot be located upon the exercise of due diligence;

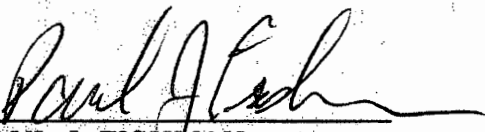
b. has been transferred or sold to, or deposited with, a third party;

- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and Title 28, United States Code, Section 2461(c).

A TRULIE BILL

FOREPERSON

  
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PAUL J. FISHMAN  
United States Attorney

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DISTRICT OF NEW JERSEY  
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CASE NUMBER: 16-187-F2N ✓

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**JONATHAN SOTO,  
a/k/a "Chronos"**

**INDICTMENT FOR**

**18 U.S.C. §§ 2251(a), 2251(e)  
18 U.S.C. § 2252A(a)(5)(B)  
18 U.S.C. § 2**

**A True/Bill,**

**Foreperson**

**PAUL J. FISHMAN  
U.S. ATTORNEY  
NEWARK, NEW JERSEY**

**MELISSA M. WANGENHEIM  
ASSISTANT U.S. ATTORNEY  
(973) 297-2074**

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(Rev. 1/97)**