

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 19-_____
	:	
v.	:	18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)
	:	
	:	
CARLOS SANTIAGO GOMEZ	:	
a/k/a "robochicken90"	:	
a/k/a "Aaron Licht"	:	

**INFORMATION**

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

On or about August 30, 2017, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

CARLOS SANTIAGO GOMEZ,  
a/k/a "robochicken90,"  
a/k/a "Aaron Licht,"

did knowingly distribute videos and images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce, 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)(2)(A) and (b)(1).

## FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant Carlos Santiago-Gomez of the offense in violation of 18 U.S.C. § 2252A(a)(2)(A) charged in 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 offense charged in 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, including but not limited to the following items seized from the defendant Carlos Santiago Gomez's residence on or about March 27, 2018:
  - i. Acer personal computer SN psvbh0300613304ca49201;
  - ii. Compaq laptop SN CND6461502;
  - iii. Pixel 2 cellular phone;
  - iv. Verbatim blue with black cover micro USB flash drive;
  - v. Intel HD model SSDSA2CW086G3 hard drive;
  - vi. Black MSI Laptop model MS-16H2;
  - vii. Transcend hard drive SN B29900-0403; and

viii. Aces Cooler Master Tower computer.

2. 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 forfeitable property listed above.

*Craig Carpenito*

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CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 19-\_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

**v.**

**CARLOS SANTIAGO GOMEZ,  
a/k/a “robochicken90,”  
a/k/a “Aaron Licht”**

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**INFORMATION**

18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)

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**CRAIG CARPENITO**  
U.S. Attorney  
Newark, New Jersey

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**DIANA VONDRA CARRIG**  
Assistant U.S. Attorney  
856-757-5026

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