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CLERK U S DISTRICT COURT
DISTRICT OF ARIZONA
BY _____ DEPUTY
REDACTED FOR PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Nereo Mejia Gomez, Jr.,

Defendant.

No. **CR-24-00783-PHX-SMB (JZB)**

REDACTED INDICTMENT

VIO: 18 USC §§ 2251(a), 2251(e)
and 2256
(Production of Child Pornography)
Counts 1 - 4

18 USC §§ 2252(a)(2),
2252(b)(1) and 2256
(Knowingly Distributing Child
Pornography)
Counts 5 - 9

18 USC §§ 2252(a)(4)(B),
2252(b)(2) and 2256
(Knowingly Possessing Child
Pornography)
Count 10

26 USC §§ 5841, 5861(d) and 5871
(Possession of an Unregistered
Firearm)
Count 11

18 USC §§ 981 and 2253,
21 USC § 853,
28 USC § 2461(c) and
26 USC § 5872
(Forfeiture Allegations)

THE GRAND JURY CHARGES:

COUNTS 1 - 4

On or about approximately the dates listed below, in the District of Arizona and elsewhere, Defendant NEREO MEJIA GOMEZ, JR. did knowingly use a minor, that is, Jane Doe (ages 15 and 16), to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting commerce and mailed if the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit:

Count	Date	File Name
1	November 9, 2022	20190802_081305.jpg (Jane Doe, Age 15)
2	February 4, 2023	Firstfuck.mp4 1675562743726.mp4 (Jane Doe, Age 16)
3	March 21, 2023	1679783121811.mp4 1679780663630.mp4 (Jane Doe, Age 16)
4	March 25, 2023	VideoCapture_20230707-131340.jpg (Jane Doe, Age 16)

All in violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

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COUNTS 5 - 9

On or about the dates below, in the District of Arizona and elsewhere, Defendant NEREO MEJIA GOMEZ, JR. did knowingly distribute a visual depiction that involved the use of a minor engaging in sexually explicit conduct and where such visual depictions were of such conduct, and where the visual depiction was mailed, shipped and transported using any means or facility of interstate or foreign commerce and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped, and transported by any means, including by computer, to wit:

Count	Date (On or about)	File Name Distributed
5	February 7, 2024	e0a99a6e-49a3-43ff-85e2-3addc3810acb.mp4 931eedbc-c94e-460d-b058-2677185a63a9.mp4
6	February 9, 2024	026a7d98-7c0c-4701-bce2-f45f456f0aee.mp4 66593203-ad39-4cd0-8782-6da8e2b4941b.mp4 23c249cc-6549-4293-8758-7bd0eea1ac5d.mp4 d08b2035-df6d-4e51-8695-860fae5f43c5.mp4 2e9eccdd-4d10-4395-830c-cc8580d49af0.mp4
7	February 10, 2024	752082ac-b92b-4365-bbc1-6b367498f1ec.mp4
8	February 14, 2024	a9171984-c279-48be-a572-e34f0b22a472.jpg
9	March 6, 2024	bedf54bb-2e77-4389-b2f4-e96879eb3d1c.mp4

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), and 2256.

COUNT 10

On or about April 10, 2024, in the District of Arizona and elsewhere, Defendant NEREO MEJIA GOMEZ, JR. did knowingly possess and access with intent to view one or more matters which contains a visual depiction that has mailed or shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or

1 so shipped or transported by any means, including by computer, if the producing of the
 2 visual depiction involved the use of a minor engaged in sexually explicit conduct and such
 3 visual depiction is of such conduct (child pornography). A visual depiction involved in the
 4 offense involved a prepubescent minor or a minor who had not attained 12 years of age.
 5 Some of the files possessed and knowingly accessed with intent to view include:

Device	File Name
Sony Vaio Laptop S/N: CXSM01BRD02D330	389897 388611 420342 431135 360886 200290 f197797888.jpg 12411101174.jpg 124076824284.jpg, 124086797177.jpg
External Hard Drive— Samsung T7 Shielded External SSD, S/N: S6NRNS0T600517H	20190802_081305.jpg Firstfuck.mp4 1675562743726.mp4 1679783121811.mp4 1679780663630.mp4 VideoCapture_20230707-131340.jpg

1	ilovecphfjziywno.onion_019.jpg
2	1552025107.jpg
3	cum on little girl.avi
4	24.jpg
5	uu.avi
6	ilovecphfjziywno.onion_100.jpg
7	ilovecphfjziywno.onion_141.jpg
8	cp niña mamando en el coche(1).mp4
9	falkoimage022.jpg
10	VID-20150419-WA0076.mp4
11	
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15 In violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2)
16 and 2256.

17 **COUNT 11**

18 On or about April 10, 2024, in the District of Arizona, Defendant NEREO MEJIA
19 GOMEZ, JR. did knowingly possess a firearm, that is a L.A.R. MFG Grizzly – 15 rifle,
20 Serial Number LX005659, with a barrel of less than 16 inches in length, not registered to
21 Defendant NEREO MEJIA GOMEZ, JR. in the National Firearms Registration and
22 Transfer Record.

23 In violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

24 **FORFEITURE ALLEGATIONS**

25 The Grand Jury realleges and incorporates the allegations of Counts 1-11 of this
26 Indictment, which are incorporated by reference as though fully set forth herein.

27 Pursuant to Title 18, United States Code, Sections 981 and 2253, Title 21 United
28 States Code, Section 853, Title 26, United States Code, Section 5872, and Title 28, United

1 States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged
2 in Counts 1-10 of this Indictment, the defendant shall forfeit to the United States of
3 America all right, title, and interest in any visual depiction, or any book, magazine,
4 periodical, film, videotape, or other matter which contains any such visual depiction, which
5 was produced, transported, mailed, shipped or received in violation of statute, and any
6 property, real or personal, constituting or traceable to gross profits or other proceeds
7 obtained from such offense, and any property, real or personal, used or intended to be used
8 to commit or to promote the commission of such offenses or any property traceable to such
9 property, including by not limited to, an external hard drive and laptop computer seized by
10 law enforcement on April 10, 2024.

11 Pursuant to Title 26, United States Code, Section 5872, and upon conviction of the
12 offense alleged in Count 11 of this Indictment, the defendant shall forfeit to the United
13 States of America all right, title, and interest in (a) any property constituting, or derived
14 from, any proceeds the persons obtained, directly or indirectly, as the result of the offense,
15 and (b) any property used, or intended to be used, in any manner or part, to commit, or to
16 facilitate the commission of such offense.

17 If any forfeitable property, as a result of any act or omission of the defendant:

- 18 (1) cannot be located upon the exercise of due diligence,
19 (2) has been transferred or sold to, or deposited with, a third party,
20 (3) has been placed beyond the jurisdiction of the court,
21 (4) has been substantially diminished in value, or
22 (5) has been commingled with other property which cannot be divided without
23 difficulty,

24 it is the intent of the United States to seek forfeiture of any other property of said defendant
25 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. Section
26 853(p).

27 All in accordance with Title 18, United States Code, Sections 981, and 2253, Title
28 21, United States Code, Section 853, Title 26, United States Code, Section 5872, Title 28,

1 United States Code, Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

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A TRUE BILL

s/
FOREPERSON OF THE GRAND JURY
Date: May 7, 2024

GARY M. RESTAINO
United States Attorney
District of Arizona

s/
GAYLE L. HELART
Assistant United States Attorney