

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
NICANDRO GARCIA a/k/a “Nicandro Garcia-Trejo,”	:	VIOLATIONS:
ANTONIA VARGAS a/k/a “Antonia Garcia”	:	18 U.S.C. § 371 (conspiracy - 1 count)
	:	18 U.S.C. § 1546(a) (counterfeiting alien registration cards - 27 counts)
	:	42 U.S.C. § 408(a)(7)(c) (counterfeiting and selling social security cards - 27 counts)
	:	18 U.S.C. § 1028(a)(2) (transferring false identification documents - 27 counts)
	:	18 U.S.C. § 1028(a)(3) (possession with intent to use or transfer five or more sets of false identification documents - 1 count)
	:	18 U.S.C. § 1028(a)(3) (possession of a document-making implement with the intent to that it be used in the production of a false identification document - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The United States Department of Homeland Security, Citizenship and Immigration Services (“USCIS”) was an agency of the United States responsible for registering persons as lawful permanent residents and issuing alien registration receipt cards (also called

resident alien cards), Form I-551, to eligible persons.

2. A genuine I-551 resident alien card evidenced that the bearer was a lawfully admitted resident of the United States.

3. Genuine resident alien cards were lawfully obtained from and issued solely by USCIS.

4. The Social Security Administration was an agency of the United States and responsible for collection of social security taxes from employers and individuals.

5. The Social Security Administration was authorized to issue and issued official documents prescribed by statute and regulation for accounting for the payment of social security taxes by individuals and employers, commonly referred to as “social security cards.”

6. Social security cards and resident alien cards served as identification documents of the United States as defined in Title 18, United States Code, Section 1028(d).

7. From on or about March 6, 2007 through on or about February 26, 2008, in Norristown, in the Eastern District of Pennsylvania, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,” and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

conspired and agreed, together, and with others unknown to the grand jury, to commit offenses against the United States, that is, to knowingly counterfeit, and aid and abet the counterfeiting of, alien registration cards, in violation of Title 18, United States Code, Section 1546, counterfeit and sell, and aid and abet the counterfeiting and sale of, social security cards, in violation of Title 42, United States Code, Section 408(a)(7)(c), transfer false identification documents, in violation

of Title 18, United States Code, Section 1028(a)(2), and possess document-making implements with the intent that those implements would be used in the production of false identification documents, in violation of Title 18, United States Code, Section 1028(a)(5).

MANNER AND MEANS

8. Defendant NICANDRO GARCIA manufactured counterfeit alien registration cards and social security cards, using names and dates of birth provided to him by individuals requesting the counterfeit alien registration cards and social security cards.

Individuals also provided defendant GARCIA with their photographs for use on the counterfeit alien registration cards.

9. Defendant NICANDRO GARCIA sold and delivered counterfeit alien registration cards and social security cards for \$80 to \$120 for a set of one counterfeit alien registration card and one counterfeit social security card.

10. Defendant ANTONIA VARGAS accepted a cash deposit, photographs and biographical information (name and date of birth) for sets of counterfeit alien registration cards and social security cards to be manufactured by defendant NICANDRO GARCIA.

11. Defendant ANTONIA VARGAS delivered sets of counterfeit alien registration cards and social security cards manufactured by defendant NICANDRO GARCIA and accepted payment for those sets of counterfeit alien registration cards and social security cards.

OVERT ACTS

In furtherance of the conspiracy, defendants NICANDRO GARCIA, ANTONIA VARGAS, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania:

1. On or about March 6, 2007, defendant NICANDRO GARCIA met with a cooperating witness, took a photograph of the cooperating witness, and received the fictitious name of Leonardo Marquez and date of birth of April 20, 1985 from the cooperating witness.

2. On or about March 6, 2007, defendant NICANDRO GARCIA manufactured and delivered to the cooperating witness a counterfeit alien registration card with the photograph of the cooperating witness, the name of Leonardo Marquez and the date of birth of April 20, 1985 and a counterfeit social security card with the name of Leonardo Marquez, for which the cooperating witness paid defendant GARCIA \$120.00.

3. On or about April 12, 2007, defendant NICANDRO GARCIA received from the cooperating witness a hand-written card with six fictitious names and dates of birth and six photographs, each photograph corresponding to a name on the hand-written card.

4. On or about April 12, 2007, defendant GARCIA manufactured and delivered to the cooperating witness six sets of counterfeit alien registration cards, each with a photograph, name, and the date of birth provided by the cooperating witness, and counterfeit social security cards, each with a name provided by the cooperating witness, for which the cooperating witness paid defendant GARCIA \$480.00, that is, \$80.00 per set of counterfeit alien registration card and social security card.

5. On or about June 28, 2007, defendant ANTONIA VARGAS received from the cooperating witness a hand-written card with ten fictitious names and dates of birth, ten photographs, each photograph corresponding to a name on the hand-written card, and \$500.00 as a deposit for ten sets of counterfeit alien registration cards and social security cards.

6. Between on or about June 28, 2007 and on or about July 17, 2007, defendant NICANDRO GARCIA manufactured ten sets of counterfeit alien registration cards, each with a photograph, name, and the date of birth provided by the cooperating witness to defendant ANTONIA GARCIA on or about June 28, 2007, and counterfeit social security cards, each with a name provided by the cooperating witness to defendant GARCIA.

7. On or about July 17, 2007, defendant ANTONIA VARGAS delivered to the cooperating witness the ten sets of counterfeit alien registration cards and social security cards manufactured by defendant NICANDRO GARCIA. Defendant VARGAS received from the cooperating witness \$200.00, the outstanding balance owed for the ten sets of counterfeit alien registration cards and social security cards.

8. On or about February 26, 2008, defendant NICANDRO GARCIA received from the cooperating witness a hand-written card with ten fictitious names and dates of birth, ten photographs, each photograph corresponding to a name on the hand-written card, and \$800.00 as payment for ten sets of counterfeit alien registration cards and social security cards.

9. On or about February 26, 2008, defendant NICANDRO GARCIA manufactured ten sets of counterfeit alien registration cards, each with a photograph, name, and the date of birth provided by the cooperating witness, and counterfeit social security cards, each with a name provided by the cooperating witness.

10. On or about February 26, 2008, defendant NICANDRO GARCIA caused Person #1, a person unknown to the grand jury, to deliver to the cooperating witness the ten sets of counterfeit alien registration cards and social security cards manufactured by defendant GARCIA.

11. On or about March 20, 2008, defendants NICANDRO GARCIA and ANTONIA VARGAS possessed in their residence, located in Norristown, Montgomery County, Pennsylvania, 80 blank and three completed counterfeit United States Social Security Cards, and 92 blank and 17 completed counterfeit Resident Alien Cards (Form I-551).

12. On or about March 20, 2008, defendants NICANDRO GARCIA and ANTONIA VARGAS possessed in their residence, located in Norristown, Montgomery County, Pennsylvania, computer scanners, an electric laminator, a commercial paper cutter, a laminate cutter, a Polaroid camera with an attachment for taking identification photographs, a fingerprinting ink pad, a sheet of laminate with embedded alien registration card (I-551) security feature markings, and a sheet of laminate with embedded INS security feature markings.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and Overt Acts 1 through 9 of Count One are realleged here.
2. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendant

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,”**

knowingly forged, counterfeited and falsely made, and aided and abetted the forgery, counterfeiting and false making of, a document, prescribed by statute and regulation as evidence of authorized stay in the United States, that is, an I-551 alien registration card, in the following fictitious names:

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
2	March 6, 2007	Leonardo Marquez
3	April 12, 2007	Alejandro Costa Maria
4	April 12, 2007	Luis Gonzalez Perez
5	April 12, 2007	Jose Mendez Garcia
6	April 12, 2007	Dagoberto Ayola Lugo
7	April 12, 2007	Maria Lopez Jimenez
8	April 12, 2007	Maricela Valenzuela Cortez
9	June 28 to July 18, 2007	Moises Marin Vasquez
10	June 28 to July 18, 2007	Luis Frutos Gomez

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
11	June 28 to July 18, 2007	Alejandro Nava Chavez
12	June 28 to July 18, 2007	Francisco Sandoval Ruiz
13	June 28 to July 18, 2007	Benito Pantoja Vergara
14	June 28 to July 18, 2007	Bernardo Alvarez Estrada
15	June 28 to July 18, 2007	Javier Dominguez Perez
16	June 28 to July 18, 2007	Elizabeth Colon Zapata
17	June 28 to July 18, 2007	Marta Lopez Maria
18	June 28 to July 18, 2007	Rafael Paniagua Diaz
19	February 26, 2008	Alfredo Romero Vazquez
20	February 26, 2008	Israel Bautista Arageon
21	February 26, 2008	Gerardo Munoz Varela
22	February 26, 2008	Antonio Lopez Rodriguez
23	February 26, 2008	Armando Cruz Pena
24	February 26, 2008	Ilaria Gonzalez Gallegos
25	February 26, 2008	Mariana Martinez Solis
26	February 26, 2008	Francisco Melendez Vargas
27	February 26, 2008	Guadalupe Hernandez Marin
28	February 26, 2008	Luis Mendez Diaz

In violation of Title 18, United States Code, Section 1546(a).

COUNTS TWENTY-NINE THROUGH FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 4 and 5 and Overt Acts 1 through 12 of Count One are realleged here.
2. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendant

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,”**

knowingly counterfeited and sold, and aided and abetted the counterfeiting and sale of, social security cards purporting to be issued by the Commissioner of the Social Security Administration, bearing the following social security numbers:

<u>COUNT</u>	<u>DATE</u>	<u>SOCIAL SECURITY NUMBER</u>
29	March 6, 2007	xxx-xx-2452
30	April 12, 2007	xxx-xx-6376
31	April 12, 2007	xxx-xx-8908
32	April 12, 2007	xxx-xx-6255
33	April 12, 2007	xxx-xx-2546
34	April 12, 2007	xxx-xx-5268
35	April 12, 2007	xxx-xx-5622
36	February 26, 2008	xxx-xx-5429
37	February 26, 2008	xxx-xx-5427
38	February 26, 2008	xxx-xx-5694

<u>COUNT</u>	<u>DATE</u>	<u>SOCIAL SECURITY NUMBER</u>
39	February 26, 2008	xxx-xx-9102
40	February 26, 2008	xxx-xx-5428
41	February 26, 2008	xxx-xx-5619
42	February 26, 2008	xxx-xx-7620
43	February 26, 2008	xxx-xx-6518
44	February 26, 2008	xxx-xx-8274
45	February 26, 2008	xxx-xx-7037

In violation of Title 42, United States Code, Section 408(a)(7)(C).

COUNTS FORTY-SIX THROUGH FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 4 and 5 and Overt Acts 1 through 7 of Count One are realleged here.

2. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,” and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

knowingly counterfeited and sold, and aided and abetted the counterfeiting and sale of, social security cards purporting to be issued by the Commissioner of the Social Security Administration, bearing the following social security numbers:

<u>COUNT</u>	<u>DATE</u>	<u>SOCIAL SECURITY NUMBER</u>
46	July 18, 2007	xxx-xx-8097
47	July 18, 2007	xxx-xx-7878
48	July 18, 2007	xxx-xx-9202
49	July 18, 2007	xxx-xx-6727
50	July 18, 2007	xxx-xx-9192
51	July 18, 2007	xxx-xx-7567
52	July 18, 2007	xxx-xx-7908
53	July 18, 2007	xxx-xx-5637
54	July 18, 2007	xxx-xx-2281

<u>COUNT</u>	<u>DATE</u>	<u>SOCIAL SECURITY NUMBER</u>
55	July 18, 2007	xxx-xx-7628

In violation of Title 42, United States Code, Section 408(a)(7)(C), and Title 18, United States Code, Section 2.

COUNTS FIFTY-SIX THROUGH SEVENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and Overt Acts 1 through 4, and 8 through 12 of Count One are realleged here.

2. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendant

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,”**

knowingly transferred, and aided and abetted the transfer of, false identification documents that appeared to have been issued under the authority of the United States, that is, false I-551 alien registration receipt cards and false social security cards, knowing such documents were produced without lawful authority, in the following fictitious names:

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
56	March 6, 2007	Leonardo Marquez
57	April 12, 2007	Alejandro Costa Maria
58	April 12, 2007	Luis Gonzalez Perez
59	April 12, 2007	Jose Mendez Garcia
60	April 12, 2007	Dagoberto Ayola Lugo
61	April 12, 2007	Maria Lopez Jimenez
62	April 12, 2007	Maricela Valenzuela Cortez
63	February 26, 2008	Alfredo Romero Vazquez
64	February 26, 2008	Israel Bautista Arageon

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
65	February 26, 2008	Gerardo Munoz Varela
66	February 26, 2008	Antonio Lopez Rodriguez
67	February 26, 2008	Armando Cruz Pena
68	February 26, 2008	Ilaria Gonzalez Gallegos
69	February 26, 2008	Mariana Martinez Solis
70	February 26, 2008	Francisco Melendez Vargas
71	February 26, 2008	Guadalupe Hernandez Marin
72	February 26, 2008	Luis Mendez Diaz

In violation of Title 18, United States Code, Sections 1028(a)(2) and (c)(1).

COUNTS SEVENTY-THREE THROUGH EIGHTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and Overt Acts 5 through 7 of Count One are realleged here.
2. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,” and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

knowingly transferred, and aided and abetted the transfer of, false identification documents that appeared to have been issued under the authority of the United States, that is, false I-551 alien registration receipt cards and false social security cards, knowing such documents were produced without lawful authority, in the following fictitious names:

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
73	July 18, 2007	Moises Marin Vasquez
74	July 18, 2007	Luis Frutos Gomez
75	July 18, 2007	Alejandro Nava Chavez
76	July 18, 2007	Francisco Sandoval Ruiz
77	July 18, 2007	Benito Pantoja Vergara
78	July 18, 2007	Bernardo Alvarez Estrada
79	July 18, 2007	Javier Dominguez Perez
80	July 18, 2007	Elizabeth Colon Zapata

<u>COUNT</u>	<u>DATE</u>	<u>FICTITIOUS NAME</u>
81	July 18, 2007	Marta Lopez Maria
82	July 18, 2007	Rafael Paniagua Diaz

In violation of Title 18, United States Code, Sections 1028(a)(2), (c)(1), and 2.

COUNT EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and Overt Act 11 of Count One are realleged here.
2. On or about March 20, 2008, in Norristown, Montgomery County, in the

Eastern District of Pennsylvania, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,”and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

knowingly possessed with intent to use unlawfully or transfer unlawfully five or more false identification documents that appeared to have been issued under the authority of the United States, that is, false I-551 alien registration receipt cards and false social security cards.

In violation of Title 18, United States Code, Sections 1028(a)(3) and (c)(1).

COUNT EIGHTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and Overt Act 12 of Count One are realleged here.

On or about March 20, 2008, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,”and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

knowingly possessed document-making implements suitable for making false identification documents of the United States, that is, computer scanners, a electric laminator, a commercial paper cutter, a laminate cutter, a Polaroid camera with an attachment for taking identification photographs, a fingerprinting ink pad, a sheet of laminate with embedded alien registration card (I-551) security feature markings, and a sheet of laminate with embedded INS security feature markings, with the intent that such document-making implements would be used in the production of false identification documents, that is, false I-551 alien registration receipt cards and false social security cards.

In violation of Title 18, United States Code, Sections 1028(a)(5) and (c)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 1028(a)(2), 1028(a)(3) and 1028(a)(5), set forth in this indictment, defendants

**NICANDRO GARCIA,
a/k/a “Nicandro Garcia-Trejo,” and
ANTONIA VARGAS,
a/k/a “Antonia Garcia”**

shall forfeit to the United States of America any property used or intended to be used in the commission of such offenses, including but not limited to:

- a. two Hewlett Packard computer scanners;
- b. an electric laminator;
- c. a commercial paper cutter;
- d. a Polaroid camera;
- e. a Polaroid camera attachment for capturing identity photographs;
- f. two Brother electronic typewriters;
- g. a laminate cutter;
- h. a CDR Marked “Corel XII”;
- i. a sheet of laminate with embedded I-551 security feature markings;
- j. a sheet of laminate with embedded United States Immigration and Naturalization Security Feature Markings;
- k. Hewlett Packard inkjet printer cartridges;
- l. two 100 ct. “Photo Plus Military Card Pouches/Lamination”;
- m. 83 blank and completed fraudulent United States social security cards; and

n. 109 blank and completed fraudulent Resident Alien Cards (Form I-551).

All pursuant to Title 18, United States Code, Section 1028(b)(5) and (g),
and Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY