FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR UNLAWFUL TRANSFER
OF A DOCUMENT OR AUTHENTICATION FEATURE

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
VICTOR MENDEZ-GUINTO	*	VIOLATION: 18 U.S.C. § 1028(a)(2)

* * *

The Grand Jury charges that:

COUNT 1

On or about August 14, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer a false identification document, to wit, a Social Security card bearing Social Security Number XXX-XX-7933, that appeared to have been issued by or under the authority of the United States, knowing that such document was produced without lawful authority; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(i), and (c)(1).

COUNT 2

On or about August 14, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer an identification document, to wit: a birth certificate

issued by the Commonwealth of Puerto Rico to E.R.M, knowing that such document was stolen and produced without lawful authority, and the production and transfer of the identification document was in and affected interstate or foreign commerce, and the offense involved the transfer of an identification document that is and appears to be a birth certificate; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(ii), and (c)(3)(A).

COUNT 3

On or about August 20, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer an identification document, to wit: a Texas State Identification Card, Number 17911520, the authentication feature and false identification document appears to have been issued by or under the authority of the State of Texas, knowing that such document was produced without lawful authority, and the production and transfer of the identification document was in and affected interstate or foreign commerce, all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(ii), and (c)(3)(A).

COUNT 4

On or about September 21, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer an identification document, to wit: a Texas State Identification Card, Number 17911565, the authentication feature and false identification document appears to have been issued by or under the authority of the State of Texas, knowing that such document was produced without lawful authority, and the production and transfer of the identification document was in and affected interstate or foreign commerce, all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(ii), and (c)(3)(A).

COUNT 5

On or about October 4, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer a false identification document, to wit, a Social Security card bearing Social Security Number XXX-XX-7933, that appeared to have been issued by or under the authority of the United States, knowing that such document was produced without lawful authority; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(i), and (c)(1).

COUNT 6

On or about October 4, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer an identification document, to wit: a birth certificate issued by the Commonwealth of Puerto Rico to K.L.A.F., knowing that such document was stolen and produced without lawful authority, and the production and transfer of the identification document was in and affected interstate or foreign commerce, and the offense involved the transfer of an identification document that is and appears to be a birth certificate; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(ii), and (c)(3)(A).

COUNT 7

On or about September 21, 2012, in the Eastern District of Louisiana, the defendant, **VICTOR MENDEZ-GUINTO**, did knowingly transfer an identification document, to wit: a Texas State Identification Card, Number 17911582, the authentication feature and false identification document appears to have been issued by or under the authority of the State of Texas, knowing that such document was produced without lawful authority, and the production and transfer of the

identification document was in and affected interstate or foreign commerce, all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(ii), and (c)(3)(A).

NOTICE OF FORFEITURE

1. The allegations of Counts 1, 2, 3, 4, 5, 6, and 7 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1028 and 982(a)(2)(B).

2. As a result of the offense, alleged in Counts 1, 2, 3, 4, 5, 6, and 7 , the defendant, **VICTOR MENDEZ-GUINTO**, shall forfeit to the United States all personal property used or intended to be used to commit the offense, as a result of identity fraud, in violation of Title 18, United States Code, Sections 1028(b)(5), including but not limited to, in that such property constitutes, or was derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations of Title 18, United States Code, Section 1028; all in violation of Title 18, United States Code, Section 982.

3. If any of the property subject to forfeiture, 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 of America to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1).

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

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New Orleans, Louisiana
December 21, 2012