

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-_____
v.	:	DATE FILED: <u>June 23, 2011</u>
JENRI LUGO-VARGAS	:	VIOLATIONS:
a/k/a "V.L.E.A."	:	18 U.S.C. § 1542 (passport fraud -1
	:	count)
	:	18 U.S.C. § 911 (falsely representing to
	:	be United States citizen -1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 16, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JENRI LUGO VARGAS,
a/k/a "V.L.E.A.,"**

an alien and a native and citizen of the Dominican Republic, knowingly and willfully made false statements in an application for a United States passport, with intent to induce and secure for his own use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant LUGO-VARGAS stated that his name was "V.L.E.A.," that his date of birth was November 17, 1976, and that his Social Security Number ended in the digits 8794, which statements he knew to be false.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JENRI LUGO-VARGAS,
a/k/a "V.L.E.A"**

an alien and a citizen and native of the Dominican Republic, falsely and willfully represented himself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney