

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

FILED IN OPEN COURT
ON 8/14/2018 MC

Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

NO. 5:18-CR-00131-FL

UNITED STATES OF AMERICA)
)
 v.) C R I M I N A L
) I N F O R M A T I O N
)
RAMON ESTEBAN PAEZ-JEREZ)

The United States Attorney charges that:

General Allegations

At all times relevant to this Criminal Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, RAMON ESTEBAN PAEZ-JEREZ, was an alien born in the Dominican Republic.

5. On or about October 4, 1986, the defendant, RAMON ESTEBAN PAEZ-JEREZ, was arrested by the United States Border Patrol in Texas when he attempted to enter the United States illegally without inspection.

6. On April 16, 1988, the defendant, RAMON ESTEBAN PAEZ-JEREZ, was ordered deported at Harlingen, Texas. The defendant, RAMON ESTEBAN PAEZ-JEREZ, failed to appear for his scheduled deportation.

7. On March 9, 1988, the defendant, RAMON ESTEBAN PAEZ-JEREZ, using the means of identification of an individual having initials C.J.P., born in the Dominican Republic, submitted an application for status as a temporary resident of the United States pursuant to the amnesty program under Section 245A of the INA.

8. On August 9, 1988, the defendant, RAMON ESTEBAN PAEZ-JEREZ, was approved for temporary resident status of using the C.J.P. identity.

9. On June 27, 1989, the defendant, RAMON ESTEBAN PAEZ-JEREZ, was granted lawful permanent resident status using the C.J.P. identity.

10. On August 8, 1996, the defendant, RAMON ESTEBAN PAEZ-JEREZ, applied for United States citizenship using the C.J.P. identity.

11. On February 12, 1999, the defendant, RAMON ESTEBAN PAEZ-JEREZ, was granted United States citizenship under the C.J.P. identity subsequent to an oath and swearing in ceremony in New York.

12. On July 7, 2007, the defendant, RAMON ESTEBAN PAEZ-JEREZ, registered to vote in North Carolina, under the C.J.P. identity, and attested under the penalty of perjury that he was C.J.P., a citizen of the United States. The defendant, RAMON ESTEBAN PAEZ-JEREZ, was assigned a polling place located in Wake County, North Carolina.

13. On or about September 16, 2009, the defendant, RAMON ESTEBAN PAEZ-JEREZ, applied for a United States passport using the C.J.P. identity.

14. On November 8, 2016, the defendant, RAMON ESTEBAN PAEZ-JEREZ, voted in the General Election of 2016 in Wake County, North Carolina, knowing he had obtained on behalf of himself United States citizenship contrary to law under the C.J.P. identity.

COUNT ONE

On or about September 16, 2009, in the Eastern District of North Carolina, the defendant, RAMON ESTEBAN PAEZ-JEREZ, did willfully and knowingly make a false statement in an application for a 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 such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated he was an individual having initials C.J.P., and that he had never used a different

name, which statement he knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, RAMON ESTEBAN PAEZ-JEREZ, an alien, knowing he had obtained his United States citizenship by fraud or misrepresentation of a material fact, and was not at the time eligible to vote in the United States, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney


BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BG
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-297-1FL(1)

UNITED STATES OF AMERICA)

v.)

ELIZABETH NENE AMACHAGHI)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

On or about November 5, 2016, in the Eastern District of North Carolina, the defendant, ELIZABETH NENE AMACHAGHI, did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, ELIZABETH NENE AMACHAGHI, an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL



FOREPERSON

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich

BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BC
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:18-cr-135-1D(4)

UNITED STATES OF AMERICA)

v.)

MARIA RUFINA CASTILLO-BOSWELL)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

On or about February 16, 2016, in the Eastern District of North Carolina, the defendant, MARIA RUFINA CASTILLO-BOSWELL, did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, MARIA RUFINA CASTILLO-BOSWELL, an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL



REDACTED VERSION
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich

BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BG
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:18-CR-133-1FL(3)

UNITED STATES OF AMERICA

v.

DORA MAYBE DAMATTA-RODRIGUEZ
a/k/a "Dora Maybe Rodriguez-
De Alejo"

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

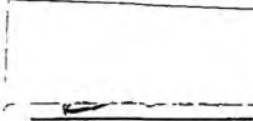
On or about September 7, 2016, in the Eastern District of North Carolina, the defendant, DORA MAYBE DAMATTA-RODRIGUEZ, also known as "Dora Maybe Rodriguez-De Alejo," did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, DORA MAYBE DAMATTA-RODRIGUEZ, also known as "Dora Maybe Rodriguez-De Alejo," an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL



FOREPERSON

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BG
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-298-1FL(3)
NO. 5:18-CR-298-2FL(3)

UNITED STATES OF AMERICA)

v.)

GUADALUPE ESPINOSA-PENA)
DENSLO ALLEN PAIGE)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

On or about September 28, 2016, in the Eastern District of North Carolina, the defendants, GUADALUPE ESPINOSA-PENA and DENSLO ALLEN PAIGE, aiding and abetting each other, did knowingly make a false statement and claim that GUADALUPE ESPINOSA-PENA was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Sections 1015(f) and 2.

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, GUADALUPE ESPINOSA-PENA, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL

FOREPERSON

REDACTED VERSION
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

731-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BB
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-300-130(i)

UNITED STATES OF AMERICA

v.

ELVIS DAVID FULLERTON

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

On or about August 20, 2016, in the Eastern District of North Carolina, the defendant, ELVIS DAVID FULLERTON, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, ELVIS DAVID FULLERTON, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL

FOREPERSON

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich

BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BG
Peter A. Moore, Jr., Clk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-301-1 FL (2)

UNITED STATES OF AMERICA)

v.)

OLIVE AGATHA MARTIN)
a/k/a "Olive Ramsey")

INDICTMENT

The Grand Jury charges that:

COUNT ONE

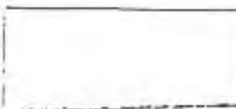
On or about October 28, 2014, in the Eastern District of North Carolina, the defendant, OLIVE AGATHA MARTIN, also known as "Olive Ramsey," did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, OLIVE AGATHA MARTIN, also known as "Olive Ramsey," an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL


FOREPERSON

REDACTED VERSION
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BC
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:18-cr-131-BO(1)

UNITED STATES OF AMERICA)

v.)

KAORU SAULS)
a/k/a "Kaoru Wada")

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

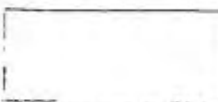
On or about November 4, 2016, in the Eastern District of North Carolina, the defendant, KAORU SAULS, also known as "Kaoru Wada," did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, KAORU SAULS, also known as "Kaoru Wada," an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL


FOREPERSON

REDACTED VERSION
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 7-1-18 *Bl*
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-302-ID(3)

UNITED STATES OF AMERICA)
)
 v.)
)
 SARAH EMILIA SILVERIO-POLANCO)
)
)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

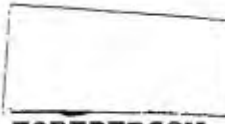
On or about October 27, 2016, in the Eastern District of North Carolina, the defendant, SARAH EMILIA SILVERIO-POLANCO, did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, SARAH EMILIA SILVERIO-POLANCO, an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL


FOREPERSON

REDACTED VERSION
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BC
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-293-1B0(3)

UNITED STATES OF AMERICA)

v.)

JOSE CRUZ SOLANO-RODRIGUEZ)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

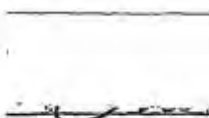
On or about July 30, 2016, in the Eastern District of North Carolina, the defendant, JOSE CRUZ SOLANO-RODRIGUEZ, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

[remainder of page intentionally left blank]

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, JOSE CRUZ SOLANO-RODRIGUEZ, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL



FOREPERSON

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED IN OPEN COURT
ON 8-1-18 BG
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-299-1FL(4)

UNITED STATES OF AMERICA)
)
 v.)
)
 DIANA PATRICIA FRANCO-RODRIGUEZ)

INDICTMENT

The Grand Jury charges that:

General Allegations

At all times relevant to this Indictment:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.
2. The term "alien" means any person not a citizen or national of the United States.
3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.
4. The defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, was an alien born in Chihuahua, Mexico.
5. On September 3, 2009, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since September 3, 2009, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, has not met the criteria for derivation of United States citizenship.

7. On or about August 29, 2012, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, registered to vote in North Carolina and attested under the penalty of perjury that she was a citizen of the United States.

8. On or about June 29, 2016, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, applied for United States citizenship and attested under the penalty of perjury that she had never claimed to be a United States citizen.

9. The defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, was assigned a polling place located in Wake County, North Carolina.

10. The defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, voted in the General Election of 2016 in Wake County, North Carolina, while her application for naturalization was pending. On June 29, 2017, her application for naturalization was denied.

11. Wake County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about June 29, 2016, in the Eastern District of North Carolina and elsewhere, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, DIANA PATRICIA FRANCO-RODRIGUEZ, stated falsely in an Application for Naturalization (Form N-400) that she had never claimed to be an United States citizen, when in fact, as she then knew, she had claimed to be a United States citizen in a North Carolina Voter Registration Application on or about August 29, 2012.

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

COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, DIANA PATRICIA FRANCO-RODRIGUEZ, an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member

of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

7-31-18

DATE

ROBERT J. HIGDON, JR.
United States Attorney

TSEVERO (S.)
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

SEALED

FILED

AUG 16 2018

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
DEP CLK

NO. 5:18-CR-328-1B0

UNITED STATES OF AMERICA

v.

ALESSANDRO CANNIZZARO

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, ALESSANDRO CANNIZZARO, was an alien born in Gela, Caltanissetta, Italy.

5. On July 21, 1985, the defendant, ALESSANDRO CANNIZZARO, was granted lawful permanent resident status at the time he entered the United States, at New York, New York pursuant to the INA.

6. On October 3, 2003 the defendant, ALESSANDRO CANNIZZARO filed an application for naturalization as a United States citizen. On March 9, 2007, his application for naturalization was denied.

7. Since March 9, 2007, the defendant, ALESSANDRO CANNIZZARO, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.

8. On May 8, 2008, the defendant, ALESSANDRO CANNIZZARO, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

9. The defendant, ALESSANDRO CANNIZZARO, was assigned a polling place located in Wake County, North Carolina.

10. The statute of limitations for false claim of citizenship with the intent to vote is five years.

11. The defendant, ALESSANDRO CANNIZZARO, voted in the General Election of 2016 in Wake County, North Carolina.

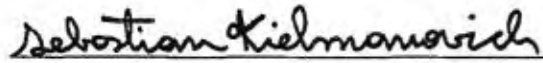
12. Wake County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, ALESSANDRO CANNIZZARO, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney


BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Alessandro Cannizzaro (hereinafter "CANNIZZARO") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that CANNIZZARO committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to CANNIZZARO:

- a. CANNIZZARO is an alien born in Gela, Caltanissetta, Italy.
- b. On July 21, 1985, CANNIZZARO was granted lawful permanent resident status at the time he entered the United States, at New York, New York.
- c. On October 3, 2003, CANNIZZARO filed an application for naturalization as a United States citizen. On March 9, 2007, his application for naturalization was denied.

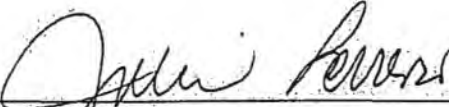
- d. Since March 9, 2007, CANNIZZARO has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.
- e. On May 8, 2008, CANNIZZARO, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.
- f. CANNIZZARO was assigned a polling place located in Wake County, North Carolina.
- g. CANNIZZARO voted in the General Election of 2016 in Wake County, North Carolina.

CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Alessandro Cannizzaro was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a).


[remainder of page intentionally left blank]

Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY DEP CLK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:18-cr-00138-1BO

UNITED STATES OF AMERICA)

v.)

HYO SUK GEORGE)

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.
2. The term "alien" means any person not a citizen or national of the United States.
3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.
4. The defendant, HYO SUK GEORGE, was an alien born in Seoul, Korea.
5. On September 25, 1995, the defendant, HYO SUK GEORGE, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since September 25, 1995, the defendant, HYO SUK GEORGE, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.

7. On October 27, 2008, the defendant, HYO SUK GEORGE, registered to vote in North Carolina and attested under the penalty of perjury that she was a citizen of the United States.

8. The defendant, HYO SUK GEORGE, was assigned a polling place located in Columbus County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, HYO SUK GEORGE, voted in the General Elections of 2008, 2010, and 2016 in Columbus County, North Carolina.

11. Columbus County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, HYO SUK GEORGE, an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Hyo Suk George (hereinafter "GEORGE") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that GEORGE committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to GEORGE:

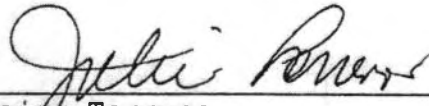
- a. GEORGE is an alien born in Seoul, Korea.
- b. On September 25, 1995, GEORGE was granted lawful permanent resident status in the United States.
- c. Since September 25, 1995, GEORGE has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.
- d. On October 27, 2008, GEORGE registered to vote in North Carolina and attested under the penalty of perjury that she was a citizen of the United States.

e. GEORGE was assigned a polling place located in Columbus County, North Carolina.

f. GEORGE voted in the General Elections of 2008, 2010, and 2016 in Columbus County, North Carolina.

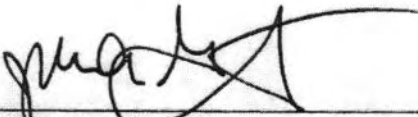
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Hyo Suk George was not a citizen of the United States at the time she voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering her arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY CB DEP CLK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-cr-00322-1BO

UNITED STATES OF AMERICA

v.

ROSEMARIE ANGELIKA HARRIS
a/k/a "Rosemarie Angelika
McLaurin"

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, ROSEMARIE ANGELIKA HARRIS, was an alien born in West Berlin, Germany.

5. On December 3, 2014, the defendant, ROSEMARIE ANGELIKA HARRIS, was granted lawful permanent resident status in the United States.

6. Since December 3, 2014, the defendant, ROSEMARIE ANGELIKA HARRIS, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.

7. On October 1, 2016, the North Carolina Board of Elections registered the defendant, ROSEMARIE ANGELIKA HARRIS, to vote despite not having signed the registration application.

8. The defendant, ROSEMARIE ANGELIKA HARRIS, was assigned a polling place located in Cumberland County, North Carolina.

9. The defendant, ROSEMARIE ANGELIKA HARRIS, voted in the General Election of 2016 in Cumberland County, North Carolina.

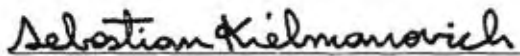
10. Cumberland County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, ROSEMARIE ANGELIKA HARRIS, also known as "Rosemarie Angelika McLaurin," an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney


BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Rosemarie Angelika Harris, also known as "Rosemarie Angelika McLaurin," (hereinafter "HARRIS") for voting

by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that HARRIS committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to HARRIS:

- a. HARRIS is an alien born in West Berlin, Germany.
- b. On December 3, 2014, HARRIS was granted lawful permanent resident status in the United States.
- c. Since December 3, 2014, HARRIS has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.

d. On October 1, 2016, the North Carolina Board of Elections registered HARRIS to vote despite not having signed the registration application.

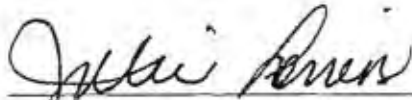
e. HARRIS was assigned a polling place located in Cumberland County, North Carolina.

f. HARRIS voted in the General Elections of 2016 in Cumberland County, North Carolina.

[remainder of page intentionally blank]

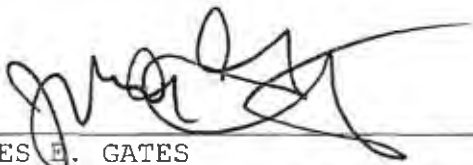
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Rosemarie Angelika Harris, also known as "Rosemarie Angelika McLaurin," was not a citizen of the United States at the time she voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering her arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EASTERN DISTRICT OF NORTH CAROLINA
BY AMS DEP CLK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-327-BO

UNITED STATES OF AMERICA)

v.)

MERIOUS JEAN)

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, MERIOUS JEAN, was an alien born in Bellevue Bassin Blue, Laplante, Haiti.

5. On January 12, 1989, the defendant, MERIOUS JEAN, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since January 12, 1989, the defendant, MERIOUS JEAN, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.

7. On September 31, 2012, the defendant, MERIOUS JEAN, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

8. The defendant, MERIOUS JEAN, was assigned a polling place located in Wilson County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, MERIOUS JEAN, voted in the General Elections of 2012 and 2016 in Wilson County, North Carolina.

11. Wilson County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, MERIOUS JEAN, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Merious Jean (hereinafter "JEAN") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that JEAN committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to JEAN:

a. JEAN is an alien born in Bellevue Bassin Blue, Laplante, Haiti.

b. On January 12, 1989, JEAN was granted lawful permanent resident status in the United States.

c. Since January 12, 1989, JEAN has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.

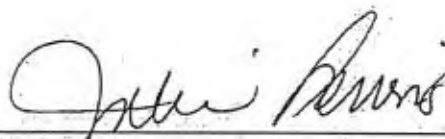
d. On September 31, 2012, JEAN registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

e. JEAN was assigned a polling place located in Wilson County, North Carolina.

f. JEAN voted in the General Elections of 2012 and 2016 in Wilson County, North Carolina.

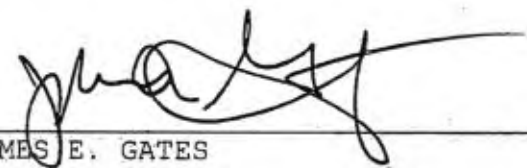
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Merious Jean was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY DEP. CLK

NO. 5:18-CR-325-1D

UNITED STATES OF AMERICA

v.

JUAN FRANCISCO LANDEROS-MIRELES

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.
2. The term "alien" means any person not a citizen or national of the United States.
3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.
4. The defendant, JUAN FRANCISCO LANDEROS-MIRELES, was an alien born in Zacatecas, Mexico.
5. On December 1, 1990, the defendant, JUAN FRANCISCO LANDEROS-MIRELES, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since December 1, 1990, the defendant, JUAN FRANCISCO LANDEROS-MIRELES, has neither applied for United States citizenship, nor been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.

7. On October 24, 2012, the defendant, JUAN FRANCISCO LANDEROS-MIRELES, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

8. The defendant, JUAN FRANCISCO LANDEROS-MIRELES, was assigned a polling place located in Wilson County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, JUAN FRANCISCO LANDEROS-MIRELES, voted in the General Elections of 2012 and 2016 in Wilson County, North Carolina.

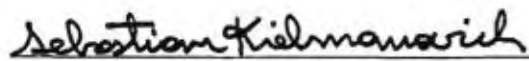
11. Wilson County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, JUAN FRANCISCO LANDEROS-MIRELES, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney


BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Juan Francisco Landeros-Mireles (hereinafter "LANDEROS") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that LANDEROS committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to LANDEROS:

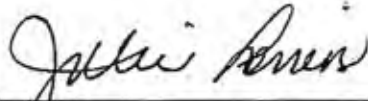
- a. LANDEROS is an alien born in Zacatecas, Mexico.
- b. On December 1, 1990, LANDEROS was granted lawful permanent resident status in the United States.
- c. Since December 1, 1990, LANDEROS has neither applied for United States citizenship, nor been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.
- d. On October 24, 2012, LANDEROS registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

e. LANDEROS was assigned a polling place located in Wilson County, North Carolina.

f. LANDEROS voted in the General Elections of 2012 and 2016 in Wilson County, North Carolina.

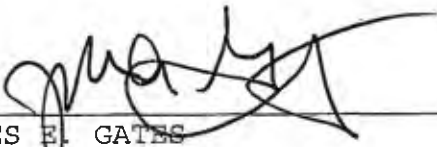
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Juan Francisco Landeros-Mireles was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
NORTHERN DIVISION

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC-
DEP CLERK

BY *CM*

NO. 2:18-cr-00029-1B0

UNITED STATES OF AMERICA

v.

JOSE JAIME RAMIRO-TORRES

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, JOSE JAIME RAMIRO-TORRES, was an alien born in San Salvador, El Salvador.

5. On March 21, 1990, the defendant, JOSE JAIME RAMIRO-TORRES, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since March 21, 1990, the defendant, JOSE JAIME RAMIRO-TORRES, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.

7. On June 10, 2011, the defendant, JOSE JAIME RAMIRO-TORRES, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

8. The defendant, JOSE JAIME RAMIRO-TORRES, was assigned a polling place located in Washington County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, JOSE JAIME RAMIRO-TORRES, voted in the General Election of 2016 in Washington County, North Carolina.

11. Washington County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, JOSE JAIME RAMIRO-TORRES, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Jose Jaime Ramiro-Torres (hereinafter "RAMIRO") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that RAMIRO committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to RAMIRO:

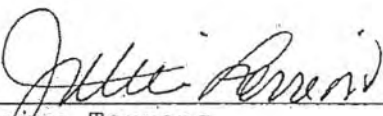
- a. RAMIRO is an alien born in San Salvador, El Salvador.
- b. On March 21, 1990, RAMIRO was granted lawful permanent resident status in the United States.
- c. Since March 21, 1990, RAMIRO has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.
- d. On June 10, 2011, RAMIRO registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

e. RAMIRO was assigned a polling place located in Washington County, North Carolina.

f. RAMIRO voted in the General Elections of 2016 in Washington County, North Carolina.

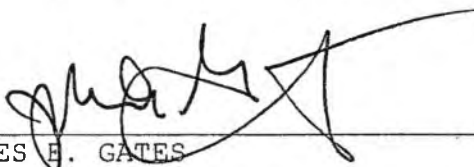
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Jose Jaime Ramiro-Torres was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY DEP CLK

NO. 5:18-CR-326-1D

UNITED STATES OF AMERICA)

v.)

DANIEL TUDEUSZ ROMANOWSKI)

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, DANIEL TUDEUSZ ROMANOWSKI, was an alien born in Wroclaw, Poland.

5. On November 8, 2004, the defendant, DANIEL TUDEUSZ ROMANOWSKI, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since November 8, 2004, the defendant, DANIEL TUDEUSZ ROMANOWSKI, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.

7. On September 12, 2012, the North Carolina Board of Elections registered the defendant, DANIEL TUDEUSZ ROMANOWSKI, to vote despite not having answered the question in his voter registration application as to whether he was a United States citizen.

8. The defendant, DANIEL TUDEUSZ ROMANOWSKI, was assigned a polling place located in Johnston County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, DANIEL TUDEUSZ ROMANOWSKI, voted in the General Elections of 2012 and 2016 in Johnston County, North Carolina.

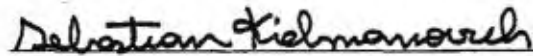
11. Johnston County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, DANIEL TUDEUSZ ROMANOWSKI, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney


BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Daniel Tudeusz Romanowski (hereinafter "ROMANOWSKI") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that ROMANOWSKI committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to ROMANOWSKI:

- a. ROMANOWSKI is an alien born in Wroclaw, Poland.
- b. On November 8, 2004, ROMANOWSKI was granted lawful permanent resident status in the United States.
- c. Since November 8, 2004, ROMANOWSKI has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.
- d. On September 12, 2012, the North Carolina Board of Elections registered ROMANOWSKI to vote despite not having answered the question in his voter

registration application as to whether he was a United States citizen.

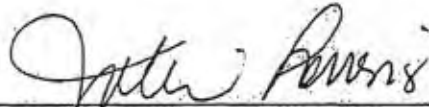
- e. ROMANOWSKI was assigned a polling place located in Johnston County, North Carolina.
- f. ROMANOWSKI voted in the General Elections of 2012 and 2016 in Johnston County, North Carolina.

CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Daniel Tudeusz Romanowski was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a).

[remainder of page intentionally left blank]

Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina

SEALED

FILED

AUG 16 2018

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY DEP. CLK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:18-cr-00045-1FL

UNITED STATES OF AMERICA)

v.)

DIEUDONNE SOIFILS)

I N F O R M A T I O N

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.

2. The term "alien" means any person not a citizen or national of the United States.

3. Pursuant to the INA, aliens are not permitted to permanently reside in the United States unless they are lawful permanent residents.

4. The defendant, DIEUDONNE SOIFILS, was an alien born in Kenscoff, Port-au-Prince, Haiti.

5. On May 5, 1976, the defendant, DIEUDONNE SOIFILS, was granted lawful permanent resident status in the United States pursuant to the INA.

6. Since May 5, 1976, the defendant, DIEUDONNE SOIFILS, has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivative citizenship.

7. On September 29, 2012, the defendant, DIEUDONNE SOIFILS, registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

8. The defendant, DIEUDONNE SOIFILS, was assigned a polling place located in Beaufort County, North Carolina.

9. The statute of limitations for false claim of citizenship with the intent to vote is five years.

10. The defendant, DIEUDONNE SOIFILS, voted in the General Elections of 2012 and 2016 in Beaufort County, North Carolina.

11. Beaufort County is located in the Eastern District of North Carolina.

[remainder of page intentionally blank]

COUNT ONE

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, DIEUDONNE SOIFILS, an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney

8-15-2018
DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

AFFIDAVIT

BACKGROUND

1. I, Jahaira Torrens (hereinafter "your affiant"), am a Special Agent (S/A) of the Department of Homeland Security (DHS), under Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), formerly known as the Immigration and Naturalization Service (INS). Previous to my appointment as an ICE-HSI S/A, I was a Detective with the Puerto Rico Police Department for approximately fifteen years. As part of my duties I conducted investigations related to controlled substances trafficking, identity theft, public corruption, violent crimes, and other violations. I have been a S/A with the federal government for approximately nine years. I am currently assigned to the ICE-HSI Resident Agent in Charge, Raleigh, North Carolina Field Office (ICE-HSI RAC/RA). I have training and experience in the application for and service of arrest and search warrants. My duties routinely include the investigation of violations of Titles 8, 18, 19, 21, and 31 of the United States Code.

2. This affidavit is made in support of a criminal information against Dieudonne Soilfis (hereinafter "SOILFIS") for voting by alien, in violation of Title 18, United States Code, Section 611(a).

3. This affidavit is submitted for the limited purpose of establishing probable cause that SOILFIS committed the offense of voting by alien, in violation of Title 18, United States Code, Section 611(a). For this reason, your affiant has not included details of every aspect of this investigation, rather only such information as necessary. Your affiant is thoroughly familiar with the information contained in this affidavit, either through personal investigation or discussions with other law enforcement officers who have interviewed individuals or personally have obtained information which they in turn have reported to your affiant.

PROBABLE CAUSE

4. Government databases reflect the following information relative to SOILFIS:

a. SOILFIS is an alien born in Kenscoff, Port-au-Prince, Haiti.

b. On May 5, 1976, SOILFIS was granted lawful permanent resident status in the United States.

c. Since May 5, 1976, SOILFIS has neither applied for United States citizenship, been naturalized as a United States citizen, nor has met the criteria for derivation of United States citizenship.


d. On September 29, 2012, SOILFIS registered to vote in North Carolina and attested under the penalty of perjury that he was a citizen of the United States.

e. SOILFIS was assigned a polling place located in Beaufort County, North Carolina.

f. SOILFIS voted in the General Elections of 2012 and 2016 in Beaufort County, North Carolina.

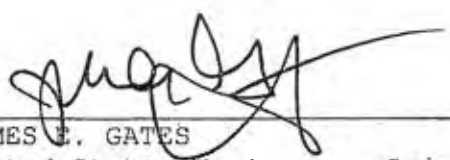
CONCLUSION

5. Based on the foregoing, I, Jahaira Torrens, believe that there is ample probable cause to conclude that Dieudonné Soilfis was not a citizen of the United States at the time he voted and is thus guilty of voting by alien, in violation of Title 18, United States Code, Section 611(a). Your affiant respectfully asks that the Court issue a warrant ordering his arrest for such crime.



Jahaira Torrens
Special Agent
Homeland Security Investigations

On this 16 day of August 2018, Special Agent Jahaira Torrens appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this Affidavit.



JAMES E. GATES
United States Magistrate Judge
Eastern District of North Carolina