

PABLO E. PAZ was also an enlisted soldier in the Louisiana Army National Guard. However, **PAZ** was not eligible to participate in G-RAP or receive incentive payments because he worked for the recruiting and retention force. His primary job was as a recruiter. In his position, Paz had access to personally identifiable information (PII), such as names, dates of birth and social security numbers, of potential soldiers that came to the recruiting station for the purpose of becoming a soldier in the Louisiana Army National Guard. Beginning in April of 2007 through October 25, 2011, **PAZ** provided the PII of potential soldiers to **MADRID**, without the knowledge or consent of the potential soldiers. **PAZ** provided this information to **MADRID** so that they could obtain G-RAP incentive payments that they were not entitled to.

MADRID entered the PII of potential soldiers into his G-RAP account, although he did not personally know each of the recruits or obtain the information directly from the recruits. Additionally, he entered false information about how, when and where he met the recruits, to appear as if he personally assisted them with the recruitment process and to justify the incentive payments. Most of the recruits **MADRID** nominated, when interviewed, stated that they did not know Madrid and did not provide him with their PII. As a result, **MADRID** received approximately \$20,000.00 in fraudulently obtained incentive payments via wire transfers into his bank account or via pre-paid debit cards. **MADRID** then provided a portion of the money received to **PAZ**. In some instances, **MADRID** paid **PAZ** by check. The total amount paid to **PAZ** by check was \$6500.00. To disguise the true nature of the payment, **MADRID** stated in the memo section of the checks that it was for “loan repayment.”

READ AND APPROVED:

PABLO E. PAZ
Defendant

Date

MARTIN E. REGAN, JR.
DAVID ARENA
Defense Counsel

Date

TRACEY N. KNIGHT
Assistant United States Attorney

Date