

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MARIA DeJESUS-GUZMAN a/k/a "W.A.A."	:	VIOLATIONS:
	:	18 U.S.C. § 1014 (loan application fraud
	:	- 1 count)
	:	18 U.S.C. § 1542 (passport fraud - 1
	:	count)
	:	18 U.S.C. § 911 (false claim of U.S.
	:	citizenship - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Bank of America, N.A. was a financial institution located in Philadelphia, Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation, Certificate No. 3510.

2. In or about April 2005, in the Eastern District of Pennsylvania, defendant

MARIA DeJESUS-GUZMAN,
a/k/a "W.A.A.,"

knowingly made and caused to be made false statements to Bank of America, N.A., for the purpose of influencing the actions of Bank of America, N.A., upon a home equity loan and/or line of credit in the amount of \$63,100, in that defendant MARIA DeJESUS-GUZMAN caused to be submitted to Bank of America, N.A., a false loan and credit application in which the

defendant falsely represented that she was W.A.A. with a Date of Birth in 1970 and Social Security Number ending with 5120, when, as defendant knew she was not W.A.A. with that Date of Birth and Social Security Number.

In violation of Title 18, United States Code, Section 1014.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 28, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARIA DeJESUS-GUZMAN,
a/k/a “W.A.A.,”**

an alien and a native and citizen of Mexico, knowingly and willfully made false statements in an application for a United States passport, with intent to induce and secure for her 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 DeJESUS-GUZMAN stated that her name was “W.A.A.,” that she was born in Puerto Rico, and was, therefore, a United States citizen, which statements she knew to be false.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 28, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MARIA DeJESUS- GUZMAN,
a/k/a/ "W.A.A.,"**

an alien and a citizen and native of Mexico, falsely and willfully represented herself to be a citizen of the United States.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From at least on or about April 8, 2005, through on or about March 31, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MARIA DeJESUS-GUZMAN,
a/k/a/ "W.A.A.,"**

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name, date of birth, social security number, and identifying information of "W.A.A.," during and in relation to loan and credit application fraud and passport fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and (c)(7).

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
United States Attorney**