

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>13-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>WALTER MORGAN, a/k/a "Walter E. Morgan Gomez"</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>42 U.S.C. § 408(a)(7)(b)(fraudulent use of social security number - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1001 (false statements - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From in or about January 2010, through in or about August 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**WALTER MORGAN,  
a/k/a "Walter E. Morgan Gomez,"**

for the purpose of obtaining and retaining employment, knowingly and willfully, and with intent to deceive falsely represented a number, specifically, a nine-digit number ending in -1629, to be the social security account number assigned by the Commissioner of Social Security to him, when in fact such number had not been assigned to him by the Commissioner of Social Security.

In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 14, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WALTER MORGAN,  
a/k/a "Walter E. Morgan Gomez,"**

in a matter within the jurisdiction of the Department of Homeland Security, U.S. Citizenship and Immigration Services, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WALTER MORGAN a/k/a "Walter E. Morgan Gomez," claimed to be a United States citizen named Walter E. Morgan, with social security number xxx-xx-1629, in an "Employment Eligibility Verification," Form I-9, which he provided to his employer, when, as the defendant knew, he was not a citizen, and had not had a social security number assigned to him by the Commissioner of Social Security.

In violation of Title 18, United States Code, Section 1001.

**A TRUE BILL:**

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**FOREPERSON**

  
**ZANE DAVID MEMEGER**  
United States Attorney