

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAMON IGNACIO ROSA-SANTOS,	:	VIOLATIONS:
a/k/a "J.L.S.,"	:	18 U.S.C. § 1542 (passport fraud - 1
a/k/a "Juan Gabriel Rosa,"	:	count)
a/k/a "Kelvin Diaz"	:	18 U.S.C. § 911 (false claim of United
		States citizenship - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

RAMON IGNACIO ROSA-SANTOS,
a/k/a "J.L.S.,"
a/k/a "Juan Gabriel Rosa,"
a/k/a "Kelvin Diaz,"

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 ROSA-SANTOS stated that his name was "J.L.S.," that he was born in Puerto Rico, and was, therefore, a United States citizen, 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 June 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMON IGNACIO ROSA-SANTOS,
a/k/a "J.L.S.,"
a/k/a "Juan Gabriel Rosa,"
a/k/a "Kelvin Diaz,"**

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