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FILED

JUL 16 2015

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY

DEPUTY CLERK

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCO ANTONIO LARA-GOMEZ,
aka Marco Antonio Lara,
aka Antonio Lara,
aka Jose Antonio Ramos,
aka Jose Antonio Ramos Maldonado,

Defendant.

CASE NO.

2:15 - CR - 0137 JAm

18 U.S.C. § 1542 – False Statement in Application for
United States Passport; 42 U.S.C. § 408(a)(7)(B) –
Use of False Social Security Number

INDICTMENT

COUNT ONE: [18 U.S.C. § 1542 – False Statement in Application for United States Passport]

The Grand Jury charges: T H A T

MARCO ANTONIO LARA-GOMEZ,
aka Marco Antonio Lara,
aka Antonio Lara,
aka Jose Antonio Ramos,
aka Jose Antonio Ramos Maldonado,

defendant herein, on or about June 1, 2007, in the State and Eastern District of California, 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

1 application the defendant claimed that his name was that of another person known to the Grand Jury and
2 referred to herein as Victim 1, which the defendant knew to be false, in violation of Title 18, United
3 States Code, Section 1542.

4 COUNT TWO: [42 U.S.C. § 408(a)(7)(B) – Use of False Social Security Number]

5 The Grand Jury further charges: T H A T

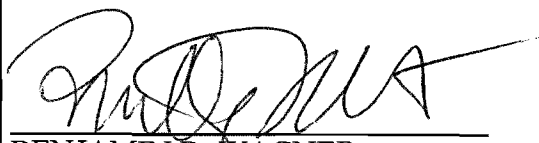
6 MARCO ANTONIO LARA-GOMEZ,
7 aka Marco Antonio Lara,
8 aka Antonio Lara,
9 aka Jose Antonio Ramos,
10 aka Jose Antonio Ramos Maldonado,

11 defendant herein, between on or about February 7, 2010, and continuing through on or about April 26,
12 2014, in the State and Eastern District of California and elsewhere, for the purpose of obtaining anything
13 of value from any person, and for some other purpose, with intent to deceive, falsely represented a
14 number to be the social security account number assigned by the Commissioner of Social Security to
15 him, when in fact such number was not the social security account number assigned by the
16 Commissioner of Social Security to him, in that the defendant used the name and social security number
17 of another person known to the Grand Jury and referred to herein as Victim 1 to apply for and receive
18 unemployment benefits from the California Employment Development Department (“EDD”), in
19 violation of Title 42, United States Code, Section 408(a)(7)(B).
20
21
22

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON

23 
24 BENJAMIN B. WAGNER
25 United States Attorney
26
27
28

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MARCO ANTONIO LARA-GOMEZ,
aka Marco Antonio Lara,
aka Antonio Lara,
aka Jose Antonio Ramos,
aka Jose Antonio Ramos Maldonado

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1542 - False Statement in Application for United States Passport;
42 U.S.C. § 408(a)(7)(B) – Use of False Social Security Number

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 16 day

of July, A.D. 2015

Clerk.

NO PROCESS NECESSARY

Bail, \$ _____

an Chu

United States v. Marco Antonio Lara-Gomez
Penalties for Indictment

Defendant

MARCO ANTONIO LARA-GOMEZ,

aka Marco Antonio Lara,
aka Antonio Lara,
aka Jose Antonio Ramos,
aka Jose Antonio Ramos Maldonado

COUNT 1:

VIOLATION: 18 U.S.C. § 1542 – False Statement in Application for United States
Passport

PENALTIES: Up to ten (10) years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to three (3) years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2:

VIOLATION: 42 U.S.C. § 408(a)(7)(B) – Use of False Social Security Number

PENALTIES: Up to five (5) years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to three (3) years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)