

UNITED STATES DISTRICT COURT
for the
Eastern District of California

FILED

JUL - 6 2015

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

BY _____
DEPUTY CLERK

United States of America
v.

Case No.

MARCO ANTONIO LARA GOMEZ
Defendant(s)

215 - MJ - 141

CKD

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2007 through March 21, 2011 in the county of Solano in the
Eastern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1542	False Statement in Application for U.S. Passport
18 U.S.C. § 1341	Mail Fraud

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/

Complainant's signature

Adam Raabe, Special Agent
U.S. State Department, Diplomatic Security Service
Printed name and title

Sworn to before me and signed ~~in my presence~~ *telephonically*

Date:

7/6/15

Carolyn K. Delaney
Judge's signature

City and state: Sacramento, California

Carolyn K. Delaney, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT OF SPECIAL AGENT ADAM RAABE
IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Adam Raabe, Special Agent, Diplomatic Security Service, being duly sworn, depose and state the following:

Introduction

1. This affidavit is submitted in support of the issuance of a criminal complaint and arrest warrant for MARCO ANTONIO LARA GOMEZ, aka Jose Antonio Ramos Maldonado (hereinafter "LARA GOMEZ"), for the following violations: misuse of, and false statement in application for, a United States passport, in violation of 18 U.S.C. § 1542; and mail fraud, in violation of 18 U.S.C. § 1341. In short, LARA GOMEZ is alleged to have applied for a United States passport, falsely stating that his name is "Jose Antonio Ramos Maldonado" and that he was born in Puerto Rico. In addition, LARA GOMEZ is alleged to have used the false identity of "Jose Antonio Ramos Maldonado" to fraudulently apply for, and receive, monetary benefits in the form of unemployment insurance payments; the benefit card used by LARA GOMEZ and a portion of the benefits received by LARA GOMEZ were transmitted through the U.S. Mail.

2. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a criminal complaint and arrest warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation. However, no detail or fact that would potentially negate probable cause has been excluded.

Affiant Background

3. I am a Special Agent ("SA") employed by the Diplomatic Security Service ("DSS"), which is an agency of the United States Department of State ("State Department").

DSS SAs are empowered under 22 U.S.C. § 2709, as well as other laws and regulations, to investigate passport fraud and other crimes and to apply for and serve search warrants.

4. I possess a Bachelor's Degree from the California State University, Long Beach. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program. I have been employed by DSS since July 2012, and have received and continue to receive, on an ongoing basis, training in the laws, rules, and regulations concerning passports. I have investigated numerous cases of passport fraud in the course of my duties.

Applicable Law

5. The Passport Act of 1926, as amended, was in full force and effect throughout the period of this investigation. This Act, codified in 22 U.S.C. § 211a, authorized the United States Secretary of State to grant and issue United States passports under rules prescribed by the President and/or other federal laws. These rules include that a person wanting a United States passport must complete and submit an application to the State Department and must submit with that application proof of: (a) United States citizenship, which is usually supported by a birth certificate; and (b) proof of identity, which is often supported by a driver's license, previously issued passport(s), or a Social Security number. Another rule allows officers at United States Post Offices and City Clerk Offices to accept passport applications, and to then forward them to the State Department for processing.

6. In relevant part, 18 U.S.C. § 1542 provides: "Whoever willfully and knowingly makes any false statement in an application for passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws . . . [s]hall be fined under this title, imprisoned not more than . . . 10 years . . . or both." It further provides the same penalties for [w]hoever willfully and knowingly uses or attempts to use, or furnishes to another for use any passport the issue of which was secured in any way by reason of any false statement. Section 3291 of Title 18 of the United States Code provides a ten-year statute of limitations for passport-related offenses.

7. In relevant part, 18 U.S.C. § 1341 provides: “Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, . . . for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fined under this title or imprisoned not more than 20 years, or both.”

Facts Supporting Probable Cause

8. I have reviewed official State Department records and learned the following:

a) On June 1, 2007, a person purporting to be “Jose Antonio Ramos” executed a DS-11 Application for a U.S. Passport, application No. 31174753, before a certified passport acceptance officer in Fairfield, California (hereinafter “2007 Passport Application”). The 2007 Passport Application identified the applicant as “Jose Antonio Ramos,” with a birthdate in 1987 (month and date omitted for privacy concerns) and a place of birth of Yauco, Puerto Rico. The applicant presented the following supporting documents: a Birth Certificate from Puerto Rico in the name Jose Antonio Ramos Maldonado, and a California State Identification Card (D[REDACTED]0868) in the name Jose Antonio Ramos Maldonado, as proof of identity.

b) On August 15, 2007, a U.S. Passport Number 428600859 was issued based on the information and statements provided to the passport acceptance officer on June 1, 2007.

9. I have reviewed records ^{of} ~~for~~ the Department of Homeland Security and learned the following:

a) On December 1, 2007, a person purporting to be Jose Antonio Ramos Maldonado, utilizing U.S. Passport 428600859, traveled from San Francisco International Airport (“SFO”) to Mexico City, Mexico.

b) On January 15, 2008, a person purporting to be Jose Antonio Ramos Maldonado, utilizing Passport 428600859, traveled from SFO to Mexico City, Mexico.

c) On January 18, 2008, a person purporting to be Jose Antonio Ramos Maldonado, utilizing Passport 428600859, traveled from Mexico City, Mexico to SFO.

d) On August 14, 2008, a person purporting to be Jose Antonio Ramos Maldonado, utilizing Passport 428600859, traveled from Sacramento Metropolitan Airport ("SMF") to Los Cabos, Mexico.

e) On August 18, 2008, a person purporting to be Jose Antonio Ramos Maldonado, utilizing Passport 428600859, traveled from Los Cabos, Mexico to SMF.

f) On January 31, 2010, a person purporting to be Jose Antonio Ramos Maldonado, utilizing Passport 428600859, traveled from SMF to Los Cabos, Mexico.

10. State Department records also reflect that on March 12, 2013, a second person purporting to be Jose Antonio Ramos Maldonado applied for a United States passport (Application No. 510127645) before a certified passport acceptance officer at the Passport Agency in Fajardo, Puerto Rico, utilizing a Birth Certificate from Puerto Rico, and a Pennsylvania Driver's License as proof of identity; the 2013 application reflected the same date of birth in 1987 reflected in the 2007 Passport Application. I compared the photographs on the 2007 Passport Application and the passport application submitted on March 12, 2013, and concluded that the two applicants are not the same person.

11. A check of the CLEAR database, which is an open-source database search engine, was conducted on the 2007 Passport Application in the name of Jose Antonio Ramos, utilizing addresses and information supplied on the 2007 Passport Application form, 143 Del Ray Court, Fairfield, CA. These checks revealed that MARCO ANTONIO LARA GOMEZ was also listed at the same address.

12. I conducted social media checks found a Facebook profile in the name of ANTONIO LARA, with photographs of a person who resembled the photograph of the applicant who submitted the 2007 Passport Application. I compared the Facebook photograph marked as

ANTONIO LARA and the photograph submitted with the 2007 Passport Application in the name Jose Antonio Ramos, and the photographs resemble the same person.

13. On September 17, 2013, I contacted via telephone the person purporting to be Jose Antonio Ramos Maldonado in Philadelphia, Pennsylvania, who had submitted the application for a United States Passport in Fajardo, Puerto Rico on March 12, 2013. Ramos Maldonado stated that he suspected his identity had been stolen, and that he had received notices from the Internal Revenue Service ("IRS"), on "Letter 12C - Request for Information," stating that the IRS required more documentation to process his IRS tax return for 2010. The IRS informed Ramos Maldonado that the tax return in question had been filed by a person with the address of 1345 Phoenix Drive, Apartment 1, Fairfield, California. However, Ramos Maldonado stated that he has never lived in, or visited, California. He also provided me with the following documents via fax:

a) Copies of IRS documents, including his signed IRS report of identity theft (IRS-14039); and

b) A police report to the Fairfield Police Department reporting the identity theft (undated), also listing a report made to the Philadelphia Police Department, dated January 20, 2011 (Case number 11-26-00375).

14. On October 9, 2013, DSS Special Agents from the Philadelphia Field Office contacted Jose Antonio Ramos Maldonado. Ramos Maldonado stated that in 2005 while living in Puerto Rico with his father, his home was broken into and his social security card, Puerto Rico identification card, and birth certificate were stolen. He further stated that in 2007, he had a Puerto Rican identification card stolen when he was living in Philadelphia, PA. Ramos Maldonado was able to correctly verify all information regarding his family and birth in Puerto Rico, and was knowledgeable about information specific to Puerto Rico. Further, he stated that he had filed police reports reporting identity theft with the Philadelphia Police Department after finding out another individual was utilizing his identity in California. The SAs provided Ramos Maldonado with a copy of the 2007 Passport Application (DS-11 #311774753), and Ramos Maldonado stated he did not recognize the individual pictured in the application, but that all the information provided was his own. The SAs obtained a sworn statement to that effect.

15. On October 29, 2013, I contacted Chelby Sharp, the Supervising Criminal Investigator ("SCI") with the State of California Employment Development Department ("EDD"), Criminal Investigations Division. SCI Sharp confirmed that a person purporting to be Jose Antonio Ramos Maldonado was receiving unemployment benefits at a mailing address of 606 Ring Neck Lane, Fairfield, California.

16. Per SCI Sharp, five (5) checks for unemployment benefits in the name of Jose Antonio Ramos Maldonado were mailed between December 24, 2009, and February 17, 2010, to 1385 Phoenix Dr. Apt 41, Fairfield, CA. An additional three (3) checks were issued between March 3, 2011, and March 21, 2011, to the same address. An EDD Electronic Benefits card issued to allow benefit money to be withdrawn directly from an Automated Teller Machine ("ATM") was sent via mail to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA. All of these addresses are listed in CLEAR as being a residence of MARCO ANTONIO LARA GOMEZ.

17. On October 29, 2013, SCI Sharp obtained photos via Bank of America Law Enforcement Liaison Branch from an ATM depicting a female using the EDD benefit card assigned to Jose Antonio Ramos Maldonado. This ATM was located in Fairfield, California.

18. I compared photos obtained from the ATM to photographs on the Facebook social media site and determined that the female depicted in the ATM photographs, albeit of limited quality, appeared to be DELIA JULISSA LOPEZ, the suspected mother of children of LARA GOMEZ. Further information relating to the identity of DELIA JULISSA LOPEZ is contained below in Paragraph 22.

19. On June 5, 2014, I contacted SCI Sharp from EDD, who confirmed that the subject purporting to be Jose Antonio Ramos Maldonado was, as of that date, still receiving unemployment benefits in that name, and that total benefits that had been received were \$12,968.00, with payments beginning February 7, 2010.

20. On June 11, 2014, I and another DSS Special Agent conducted surveillance at 606 Ring Neck Lane, Suisun City, CA. No movement was observed, but two vehicles were observed in the front of the location, parked in the driveway marked in paint as "606" on the sidewalk

directly in front of the residence: a 2007 Cadillac Escalade bearing California license plate 6PIW691, registered to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA; and a 2002 Cadillac Escalade bearing California license plate 7DWR257, registered to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA. Vehicle registration information was obtained via TECS, a computer database containing vehicle registration information, amongst other data.

21. On December 23, 2014, I performed an address search in the State Department's Consolidated Consular Database for 606 Ring Neck Lane, Suisun City, CA, for additional passports applications from this address. Two U.S. Passports were issued to this address: (1) U.S. Passport number 516675672 issued in the name with initials J.S.L.L., a minor, with a date of birth in 2010; and U.S. Passport number 516675671 issued in the name with initials E.N.L.L., a minor, with a date of birth in 2003. These passports were issued on April 28, 2014.

22. On the DS-11 applications for United States Passports submitted for J.S.L.L. and E.N.L.L., the father of both children was listed as MARCO ANTIONIO LARA GOMEZ, with a date of birth of [REDACTED], 1988, and a birthplace of Toluca, Mexico. In addition, a photocopy of a Mexican Consular Identification card in the name of MARCO ANTIONIO LARA GOMEZ was attached to both passport applications. I compared the photograph on the Mexican Consular Identification card in the name of MARCO ANTIONIO LARA GOMEZ with the photograph attached to the 2007 Passport Application that resulted in the issuance of U.S. Passport number 428600859, and confirmed a match. Furthermore, the mother of both children was listed as DELIA JULISSA LOPEZ, with a date of birth of [REDACTED], 1979, and a birthplace of Guatemala. Attached to both passport applications was a photocopy of a Guatemalan passport in the name of DELIA JULISSA LOPEZ. I compared the profile photos from the Facebook page of "Julissa Lopez" and the ATM photos supplied by Bank of America, to the Guatemalan passport attached to the U.S. Passport applications for the minor children, all of which appeared to be of the same individual.

23. A review of all available information leads me to conclude that the person purporting to be Jose Antonio Ramos Maldonado in connection with the 2007 Passport

Application, DS-11 application number 31174753 submitted in Fairfield, California, on June 1, 2007, and MARCO ANTONIO LARA GOMEZ, are the same person.

24. A review of all available information leads me to conclude that the person purporting to be Jose Antonio Ramos Maldonado devised a scheme to defraud involving his fraudulently obtaining of EDD monetary benefits using the false identity of Jose Antonio Ramos Maldonado; such scheme involved use of the U.S. mail.

[continued on next page]

Conclusion

25. Based on the facts and information detailed in this affidavit, probable cause exists that MARCO ANTONIO LARA GOMEZ knowingly and willingly made a false statement in application for a passport in violation of 18 U.S.C. § 1542, when he falsely stated that his name was "Jose Antonio Ramos Maldonado" in the June 1, 2007 application for a U.S. passport, which was presented to a passport acceptance officer in Fairfield, California, in the Eastern District of California. Probable cause supports that MARCO ANTONIO LARA GOMEZ later used the passport issued in connection with the 2007 application. Probable cause also exists to believe that MARCO ANTONIO LARA GOMEZ devised a scheme to defraud to fraudulently obtain unemployment insurance benefits using the false identity of Jose Antonio Ramos Maldonado, a scheme that involved use of the U.S. mail.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

/s/
Special Agent Adam Raabe
Diplomatic Security Service
San Francisco Field Office

Approved as to form:

Nirav K. Desai
Nirav K. Desai
Assistant U.S. Attorney

Subscribed and sworn before me this 6th day of July, 2015.

Carolyn K. Delaney
HONORABLE CAROLYN K. DELANEY
United States Magistrate Judge
U.S. District Court, Eastern District of California

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of California

United States of America

v.

MARCO ANTONIO LARA GOMEZ

Defendant(s)

Case No.

15-MJ-141 CKD

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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY JMS
DEPUTY CLERK**CRIMINAL COMPLAINT**

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Eastern District of California, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1542

False Statement in Application for U.S. Passport

18 U.S.C. § 1341

Mail Fraud

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.Sworn to before me and signed in my presence. telephonically

Date:

7/6/15City and state: Sacramento, California*Complainant's signature*Adam Raabe, Special Agent
U.S. State Department, Diplomatic Security Service*Printed name and title**Judge's signature*

Carolyn K. Delaney, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF SPECIAL AGENT ADAM RAABE
IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Adam Raabe, Special Agent, Diplomatic Security Service, being duly sworn, depose and state the following:

Introduction

1. This affidavit is submitted in support of the issuance of a criminal complaint and arrest warrant for MARCO ANTONIO LARA GOMEZ, aka Jose Antonio Ramos Maldonado (hereinafter "LARA GOMEZ"), for the following violations: misuse of, and false statement in application for, a United States passport, in violation of 18 U.S.C. § 1542; and mail fraud, in violation of 18 U.S.C. § 1341. In short, LARA GOMEZ is alleged to have applied for a United States passport, falsely stating that his name is "Jose Antonio Ramos Maldonado" and that he was born in Puerto Rico. In addition, LARA GOMEZ is alleged to have used the false identity of "Jose Antonio Ramos Maldonado" to fraudulently apply for, and receive, monetary benefits in the form of unemployment insurance payments; the benefit card used by LARA GOMEZ and a portion of the benefits received by LARA GOMEZ were transmitted through the U.S. Mail.

2. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a criminal complaint and arrest warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation. However, no detail or fact that would potentially negate probable cause has been excluded.

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3. I am a Special Agent ("SA") employed by the Diplomatic Security Service ("DSS"), which is an agency of the United States Department of State ("State Department").

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4. I possess a Bachelor's Degree from the California State University, Long Beach. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program. I have been employed by DSS since July 2012, and have received and continue to receive, on an ongoing basis, training in the laws, rules, and regulations concerning passports. I have investigated numerous cases of passport fraud in the course of my duties.

Applicable Law

5. The Passport Act of 1926, as amended, was in full force and effect throughout the period of this investigation. This Act, codified in 22 U.S.C. § 211a, authorized the United States Secretary of State to grant and issue United States passports under rules prescribed by the President and/or other federal laws. These rules include that a person wanting a United States passport must complete and submit an application to the State Department and must submit with that application proof of: (a) United States citizenship, which is usually supported by a birth certificate; and (b) proof of identity, which is often supported by a driver's license, previously issued passport(s), or a Social Security number. Another rule allows officers at United States Post Offices and City Clerk Offices to accept passport applications, and to then forward them to the State Department for processing.

6. In relevant part, 18 U.S.C. § 1542 provides: "Whoever willfully and knowingly makes any false statement in an application for passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws . . . [s]hall be fined under this title, imprisoned not more than . . . 10 years . . . or both." It further provides the same penalties for [w]hoever willfully and knowingly uses or attempts to use, or furnishes to another for use any passport the issue of which was secured in any way by reason of any false statement. Section 3291 of Title 18 of the United States Code provides a ten-year statute of limitations for passport-related offenses.

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Facts Supporting Probable Cause

8. I have reviewed official State Department records and learned the following:

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b) On August 15, 2007, a U.S. Passport Number 428600859 was issued based on the information and statements provided to the passport acceptance officer on June 1, 2007.

9. I have reviewed records ^{from} ~~from~~ the Department of Homeland Security and learned the following:

a) On December 1, 2007, a person purporting to be Jose Antonio Ramos Maldonado, utilizing U.S. Passport 428600859, traveled from San Francisco International Airport (“SFO”) to Mexico City, Mexico.

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12. I conducted social media checks found a Facebook profile in the name of ANTONIO LARA, with photographs of a person who resembled the photograph of the applicant who submitted the 2007 Passport Application. I compared the Facebook photograph marked as

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16. Per SCI Sharp, five (5) checks for unemployment benefits in the name of Jose Antonio Ramos Maldonado were mailed between December 24, 2009, and February 17, 2010, to 1385 Phoenix Dr. Apt 41, Fairfield, CA. An additional three (3) checks were issued between March 3, 2011, and March 21, 2011, to the same address. An EDD Electronic Benefits card issued to allow benefit money to be withdrawn directly from an Automated Teller Machine ("ATM") was sent via mail to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA. All of these addresses are listed in CLEAR as being a residence of MARCO ANTONIO LARA GOMEZ.

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20. On June 11, 2014, I and another DSS Special Agent conducted surveillance at 606 Ring Neck Lane, Suisun City, CA. No movement was observed, but two vehicles were observed in the front of the location, parked in the driveway marked in paint as "606" on the sidewalk

directly in front of the residence: a 2007 Cadillac Escalade bearing California license plate 6PIW691, registered to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA; and a 2002 Cadillac Escalade bearing California license plate 7DWR257, registered to Jose Antonio Ramos Maldonado at 606 Ring Neck Lane, Suisun City, CA. Vehicle registration information was obtained via TECS, a computer database containing vehicle registration information, amongst other data.

21. On December 23, 2014, I performed an address search in the State Department's Consolidated Consular Database for 606 Ring Neck Lane, Suisun City, CA, for additional passports applications from this address. Two U.S. Passports were issued to this address: (1) U.S. Passport number 516675672 issued in the name with initials J.S.L.L., a minor, with a date of birth in 2010; and U.S. Passport number 516675671 issued in the name with initials E.N.L.L., a minor, with a date of birth in 2003. These passports were issued on April 28, 2014.

22. On the DS-11 applications for United States Passports submitted for J.S.L.L. and E.N.L.L., the father of both children was listed as MARCO ANTIONIO LARA GOMEZ, with a date of birth of [REDACTED], 1988, and a birthplace of Toluca, Mexico. In addition, a photocopy of a Mexican Consular Identification card in the name of MARCO ANTIONIO LARA GOMEZ was attached to both passport applications. I compared the photograph on the Mexican Consular Identification card in the name of MARCO ANTIONIO LARA GOMEZ with the photograph attached to the 2007 Passport Application that resulted in the issuance of U.S. Passport number 428600859, and confirmed a match. Furthermore, the mother of both children was listed as DELIA JULISSA LOPEZ, with a date of birth of [REDACTED], 1979, and a birthplace of Guatemala. Attached to both passport applications was a photocopy of a Guatemalan passport in the name of DELIA JULISSA LOPEZ. I compared the profile photos from the Facebook page of "Julissa Lopez" and the ATM photos supplied by Bank of America, to the Guatemalan passport attached to the U.S. Passport applications for the minor children, all of which appeared to be of the same individual.

23. A review of all available information leads me to conclude that the person purporting to be Jose Antonio Ramos Maldonado in connection with the 2007 Passport

Application, DS-11 application number 31174753 submitted in Fairfield, California, on June 1, 2007, and MARCO ANTONIO LARA GOMEZ, are the same person.

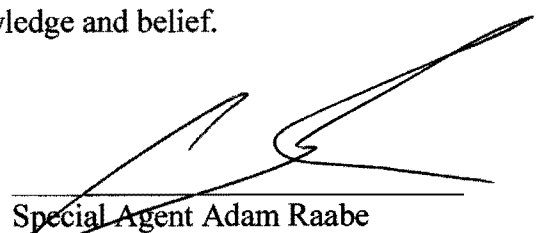
24. A review of all available information leads me to conclude that the person purporting to be Jose Antonio Ramos Maldonado devised a scheme to defraud involving his fraudulently obtaining of EDD monetary benefits using the false identity of Jose Antonio Ramos Maldonado; such scheme involved use of the U.S. mail.

[continued on next page]

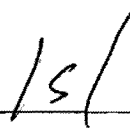
Conclusion

25. Based on the facts and information detailed in this affidavit, probable cause exists that MARCO ANTONIO LARA GOMEZ knowingly and willingly made a false statement in application for a passport in violation of 18 U.S.C. § 1542, when he falsely stated that his name was "Jose Antonio Ramos Maldonado" in the June 1, 2007 application for a U.S. passport, which was presented to a passport acceptance officer in Fairfield, California, in the Eastern District of California. Probable cause supports that MARCO ANTONIO LARA GOMEZ later used the passport issued in connection with the 2007 application. Probable cause also exists to believe that MARCO ANTONIO LARA GOMEZ devised a scheme to defraud to fraudulently obtain unemployment insurance benefits using the false identity of Jose Antonio Ramos Maldonado, a scheme that involved use of the U.S. mail.

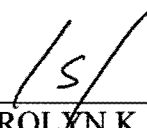
I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.


Special Agent Adam Raabe
Diplomatic Security Service
San Francisco Field Office

Approved as to form:


Nirav K. Desai
Assistant U.S. Attorney

Subscribed and sworn before me this 6th day of July, 2015.


HONORABLE CAROLYN K. DELANEY
United States Magistrate Judge
U.S. District Court, Eastern District of California