

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL NO. 15-210**

v. * **SECTION: "R"**

ALEJANDRO D. RODRIGUEZ *

* * *

FACTUAL BASIS

The defendant, Alejandro D. Rodriguez (hereinafter "**Alejandro**"), has agreed to plead guilty to counts 2, 3, 4, and 5 of indictment charging him conspiracy to unlawfully transfer an identification document and transfer of an identification document in violation of Title 18, United States Code, Section 1028(a)(f) and Title 42 U.S.C. § 408(a)(7)(C), respectively.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

On February 19, 2015, a Confidential Source ("CS") contacted Jorge Maldonado ("Maldonado") to determine if Maldonado could sell him a real social security card and birth certificate. On February 20, 2015, the CS and Maldonado spoke on the phone several times to discuss the transaction. During the calls, Maldonado told the CS the price of the documents, and confirmed that the CS will not have any problems because the "papers are proven." On February 25, 2015, the CS and Maldonado met in Maldonado's Nissan pickup truck, which was parked in the parking lot of the Brothers Food Mart on Veterans Blvd., to further discuss the deal. During

the meeting, which was audio and video recorded, Maldonado told the CS that, "it's getting complicated with Puerto Rican papers." Maldonado then instructed the CS to meet him that evening at a house located on Park Manor Street in Metairie to complete the deal. Sometime thereafter, the CS went to the said house to meet Maldonado. After arriving at the location, the CS and Maldonado entered a maroon Chevy minivan parked in the driveway, which was also occupied to by **Alejandro** and Damian R. Rodriguez ("Damian").

Moments later, the CS exited the van, entered his car, and drove off to a predetermined location to meet with the Homeland Security Investigation ("HSI") special agents that he was working with. After arriving at the predetermined meeting spot, the CS handed a Puerto Rican birth certificate and social security card to the agents. The CS told the agents that he bought the documents from **Alejandro** with the cash (\$1,500) they had supplied him to complete the transaction. Both documents were issued to an individual hereinafter referred to as Mr. P. On the following day, Damian called the CS and offered to help him obtain a Louisiana driver's license using the purchased documents if the CS would pay him \$150. The CS agreed the proposal and drove with Damian later that day to OMV office in St. Charles Parish to apply for a license. During the drive to the OMV office, Damian counseled the CS on what to say to the OMV employees during the application process. Shortly after arriving at the OMV office, the CS, with Damian's assistance, submitted an application for a driver's license. However, the application was denied because the CS did not have a third a piece of identification that was required by the OMV to verify his identity.

The HSI Forensic Lab analyzed the documents that the CS purchased from the defendants on April 2, 2015, and their analysis revealed that the documents were authentic. A

special agent with HSI also verified that the social security number on the card was real and had been issued to Mr. P. by the Social Security Administration.


On March 4, 2015, the CS called **Alejandro** and asked for more documents, and **Alejandro** agreed to provide a second set to the CS for \$1,500. On March 14, 2015, the CS met **Alejandro** in the parking lot of the Walmart grocery store on Williams Blvd., to do the deal. The CS and **Alejandro** completed this transaction inside **Alejandro's** maroon Chevy van. After the deal was completed, the CS turned over a Puerto Rican birth certificate and social security card that he purchased from **Alejandro** to the agents. Both documents were issued to an individual hereinafter referred to as Mr. A.

The documents were analyzed by the HSI Forensic Lab on April 6, 2015, and their analysis revealed that the documents were authentic. A special agent with HSI also verified that the social security number on that card was real and had been issued to Mr. A by the Social Security Administration.

On April 9, 2015, the CS called **Alejandro** and asked for more documents, and **Alejandro** agreed to sell him another set for \$1,300. On April 11, 2015, the CS met with **Alejandro** in the Walmart parking lot on Williams Blvd., to give him a deposit of \$500 towards the purchase of the documents. On or about April 11, 2015, **Alejandro** and the CS had lengthy (recorded) conversation regarding identification documents. During the call, **Alejandro** admitted to the CS that the genuine birth certificates and social security cards that he deals in are sent to him through the U.S. mail by his contact in Puerto Rico. On April 23, 2015, **Alejandro** informed the CS over the phone that the documents were ready and that they should meet again in the same location to complete the transaction. On April 25, 2015, the CS drove to the

Walmart Parking lot for the meeting. Moments later, **Alejandro** arrived in the parking lot driving a white Ford Expedition. The CS then entered the Expedition and completed the transaction with **Alejandro** by paying him \$800 for a Puerto Rican birth certificate and social security card. After the deal was completed, the CS turned over the documents to the agents. Both documents were issued to an individual hereinafter referred to as Mr. J.

The documents were analyzed by the HSI Forensic Lab on May 5, 2015, and their analysis revealed that they were authentic. A special agent with HSI also confirmed the social security number on the card was a real and had been issued to Mr. J by the Social Security Administration.

 2-17-2016

SPIRO G. LATSIS Date
Assistant United States Attorney

ALEJANDRO RODRIGUEZ Date
Defendant

SAMUEL J. SCILLITANI, JR. Date
Attorney for Defendant