

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

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

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

**DAMIAN R. RODRIGUEZ** \*

\* \* \*

**FACTUAL BASIS**

The defendant, Damian Rodriguez (hereinafter "**Damian**"), has agreed to plead guilty to count 2 of indictment charging him conspiracy to unlawfully transfer an identification document in violation of Title 18, United States Code, Section 1028(a)(f).

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:

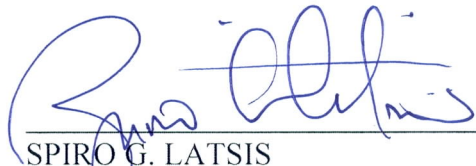
On February 19, 2015, a Confidential Source ("CS") contacted Jorge Maldonado ("Maldonado") to determine if Maldonado could sell him a real social security card and birth certificate. On February 20, 2015, the CS and Maldonado spoke on the phone several times to discuss the transaction. During the calls, 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 Titan pickup truck, which was parked at the Brothers Food Mart on Veterans Blvd., to further discuss the deal. During the meeting 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 Rodriguez and **Damian**.

Moments later, the CS exited the van, entered his car, and drove off to a predetermined location to meet the Homeland Security Investigation 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** gave the CS specific instructions on how to interact with the OMV employees during the application process. After arriving at the OMV office, the CS submitted an application for a driver's license with the assistance of **Damian**, but 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.

 8.2-2016  
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SPIRO G. LATSIS Date  
Assistant United States Attorney

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DAMIAN R. RODRIGUEZ Date  
Defendant

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MILTON P. MASINTER Date  
Attorney for Defendant