UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 16-52

* SECTION: "F"

VIDAL OROSCO-BARRIOS

* * *

FACTUAL BASIS

The defendant, **VIDAL OROSCO-BARRIOS** (hereinafter "**OROSCO**"), has agreed to plead guilty as charged to the four-count indictment charging him with the illegal transfer of fraudulent identification documents in violation of Title 18, United States Code, Section 1028(a)(2).

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:

Special Agents with the Department of Homeland Security ("HSI") obtained information from a Confidential Source ("CS") that an unidentified Hispanic male was selling fraudulent social security cards and permanent resident alien cards to buyers working and residing in the New Orleans metro area. Based on the foregoing and other information they obtained from their investigation, the agents were able to identify the aforesaid individual as **VIDAL OROSCO-BARRIOS**. After they determined his identity, the agents decided to attempt to buy fraudulent identification documents from him. Accordingly, on October 26, 2015, a CS at the direction of

HSI called **OROSCO** on his cell phone and requested a fraudulent permanent resident card and fraudulent social security card. **OROSCO** agreed to provide him the documents for \$150 and requested that the CS send him a photograph of himself, date of birth, name and country of origin. On October 29, 2015, the CS and **OROSCO** met in the parking lot of the Home Depot in Gretna, where they exchanged cash for documents. After the deal was completed, the CS turned over to the agents a fraudulent permanent resident card bearing the name Jose Naun Amaya and number XXX-XXX-639, and fraudulent social security card bearing the name Jose Naun Amaya and social security card number XXX-XXX-9534.

On December 8, 2015, a CS at the direction of HSI called **OROSCO** on his cell phone and requested a fraudulent permanent resident card and fraudulent social security card. **OROSCO** agreed to provide him the documents for \$150. **OROSCO** also requested that the CS forward a photograph of himself and his biographical information. On December 14, 2015, the CS and **OROSCO** met at an apartment complex on Division Street in Metairie, where they exchanged cash for documents. After the deal was completed, the CS turned over to the agents a fraudulent permanent resident card bearing the name Javier Enrique Velasquez Amaya and number XXX-XXX-395, and fraudulent social security card bearing the name Javier Enrique Velasquez Amaya and social security card number XXX-XXX-5234.

On February 17, 2016, a CS at the direction of HSI called **OROSCO** on his cell phone and requested a fraudulent permanent resident card and fraudulent social security card. **OROSCO** agreed to provide him the documents for \$150. **OROSCO** also requested that the CS send him a photograph of himself and his biographical information. Later that evening, the CS and **OROSCO** met at an apartment complex on Kent Street in Metairie, where they exchanged

cash for documents. After the deal was completed, the CS turned over to the agents a fraudulent permanent resident card bearing the name Marvin Menendez and number XXX-XXX-604, and fraudulent social security card bearing the name Marvin Menedez and social security card number XXX-XX-4645.

On March 15, 2016, a CS at the direction of HSI called **OROSCO** on his cell phone and requested a fraudulent permanent resident card and fraudulent social security card. **OROSCO** agreed to provide him the documents for \$150. **OROSCO** also requested that the CS send him a photograph of himself and his biographical information. Later that evening the CS and **OROSCO** met at the Walmart Store in Harvey, where they exchanged cash for documents. After the deal was completed, the agents arrested **OROSCO** as he was sitting in his vehicle. Following the arrest, the CS turned over to the agents a fraudulent permanent resident card bearing the name Luis Angel Martinez Toledo and number XXX-XXX-110, and fraudulent social security card bearing the name Luis Angel Martinez Toledo and social security card number XXX-XX-2515

Sometime after these transactions were completed, HSI agents forwarded the fraudulent permanent resident cards and social security cards to the HSI forensic laboratory for examination. A Forensic Document Examiner analyzed the all of the documents purchased from **OROSCO** and determined that the U.S. permanent resident cards and U.S. social security cards were counterfeits that gave the appearance to have been issued by U.S. Immigration Services and the Social Security Administration.

The HSI agents then ran checks of various federal data bases to determine if the cards had ever been issued by the U.S. government to individuals listed on the cards. The records checks

on the permanent resident card and social security cards were fake numbers.

and the	8-17-2016
SPIROG. LATSIS	Date
Assistant United States Attorney	

VIDAL OROSCO-BARRIOS	Date
Defendant	
SAMUEL J. SCILLITANI, JR.	Date
Attorney for Defendant	
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