

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 22-85
v.	*	SECTION: "L"
MARIO MATEO TOMAS JOSE	*	
	* * *	

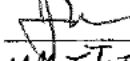
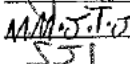

FACTUAL BASIS

Were this matter brought to trial, the United States would prove, through competent evidence, the following beyond a reasonable doubt:

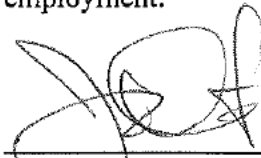
On March 29, 2022, Homeland Security Investigations received information that certain individuals had used fraudulent Social Security cards in an initial application to obtain employment. Prior to finalizing employment with their prospective company, the individuals had to report to the Gulf Coast Safety Council, which provides safety courses to applicants applying to work with companies that service petrochemical processing plants.

On March 30, 2022, **MARIO MATEO TOMAS JOSE ("TOMAS JOSE")** arrived at the Gulf Coast Safety Council office in St. Rose, Louisiana (located within the Eastern District of Louisiana), to complete the safety course in order to finalize his employment with Company "A." On that day, **TOMAS JOSE** once again presented the fraudulent United States Social Security card bearing the name and United States Social Security number [REDACTED] of a United States citizen, [REDACTED] which he represented to be his own.

Testimony and evidence would prove that the purported United States Social Security card was fraudulent, and contained [REDACTED] Social Security number on the card, ending in [REDACTED]. A photographic comparison of [REDACTED] did not match that of **TOMAS JOSE**.

AUSA 
Defendant 
Defense Counsel 


TOMAS JOSE's admission and other testimony would prove that he used the United States Social Security card number of [REDACTED] in order to deceive the Gulf Coast Safety Council and Company "A" into thinking that the number belonged to him and that he was eligible to obtain employment.



JON M. MAESTRI
Assistant United States Attorney

11/17/2022

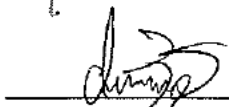
Date



SAMUEL J. SCILLITANI
Attorney for Defendant

11/16/2022

Date



MARIO MATEO TOMAS JOSE
Defendant

11/16/22

Date