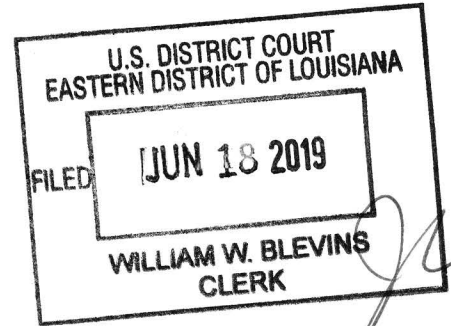


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 19-58
v. * SECTION: "A"
DARRYL SANDERS *
a/k/a Daryl Saunders *
* * *

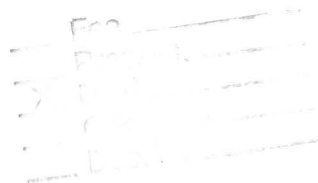


FACTUAL BASIS

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

The case against **DARRYL SANDERS** ("SANDERS") developed as a result of a referral to the U.S. Department of State, Diplomatic Security Service ("DSS"), from the National Passport Center, Fraud Prevention Unit ("NPCFPU"). The NPCFPU suspected fraud in connection with the March 27, 2018, submission of a passport renewal application from **SANDERS**. **SANDERS** mailed the application and a Postal money order in the name Daryl Saunders from Slidell, LA.

The DSS initiated an investigation into **SANDERS'** passport application and discovered he used a false name ("Daryl Saunders") and false date of birth ("09/03/1958") on his 2018 passport application. DSS also learned **SANDERS** had fraudulently obtained passports in 1998 and 2008 using the same false name and date of birth. The DSS determined, with the assistance of the Bureau of Vital Records and Statistics for the State of Louisiana, that, in 1991, **SANDERS** submitted a fraudulent Louisiana Certificate of Live Birth ("Birth Certificate") to apply for a Social Security Administration ("SSA") Social Security Card claiming he was Daryl Saunders, born at



AUSA *BK*
Defense Counsel *NW*
Defendant *SW*

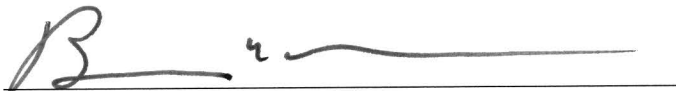
Touro Infirmary, on September 3, 1958. As a result, SANDERS was issued a Social Security number (“SSN”) ending in 8947. During their investigation. The agents located SANDERS’ original birth certificate revealing that Darryl SANDERS was born at Charity Hospital on September 3, 1957.

On January 29, 2019, SA Robert Becker contacted SANDERS telephonically at the number listed on his Passport application. SANDERS told SA Becker that he was currently disabled and not employed. SANDERS said he was living in Slidell, LA when he applied for his 2018 Passport renewal. According to SANDERS, he used P.O. Box 1984, Slidell, LA as his mailing address. SANDERS said he had his photo taken at the Slidell Post Office and purchased the money at the Post Office. Finally, SANDERS said he mailed the 2018 Passport renewal application from the Slidell Post Office.

Various records and testimonial evidence, including testimony from representatives of Social Security Administration, U.S. Department of State, Diplomatic Security Service, Bureau of Vital Records and Statistics, State of Louisiana, and other witnesses would also be admitted to prove the facts set forth above.

LIMITED NATURE OF FACTUAL BASIS

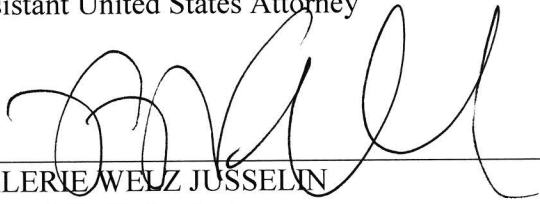
This Factual Basis is not intended to constitute a complete statement of all facts known by the government and the defendant, but rather is a minimum statement of facts intended to prove the necessary factual predicate for defendant's guilty plea. The limited purpose of this Factual Basis is to demonstrate that there exists sufficient legal basis for defendant's plea of guilty to the charged offense.



BRIAN M. KLEBBA
Assistant United States Attorney



DATE



VALERIE WELZ JUSSSELIN
Counsel for Defendant



DATE



DARRYL SANDERS
Defendant



DATE