

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 22-90
v.	*	SECTION: "E" (3)
JOSE GARCIA-NUNEZ	*	VIOLATION: 42 U.S.C. § 408(a)(7)(B)
	*	*
	*	*

**FACTUAL BASIS**

The defendant, **JOSE GARCIA-NUNEZ**, has agreed to plead guilty to unlawfully misusing a social security number. Should this matter have proceeded to trial, the United States 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.<sup>1</sup>

**Overview of Offense**

On or about March 30, 2022, **JOSE GARCIA-NUNEZ** ("NUNEZ") presented a false social security card to an employee at the Gulf Coast Safety Council while signing in for pre-employment testing. The Gulf Coast Safety Council (GCSC) is an entity chartered by the state to provide training and workplace education to plant personnel and contract workers that provide labor services to local industries.

At the time of the offense, **NUNEZ** was scheduled to take an orientation course needed to obtain employment with Company "A." During the intake process at GCSC in St. Rose, Louisiana, **NUNEZ** used a social security card and a state identification card that a GCSC employee suspected were fraudulent. GCSC then notified the Department of Homeland Security. Special agents with

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<sup>1</sup> This proffer of evidence is not intended to constitute a complete statement of facts known to the United States. The limited purpose of this factual basis is to demonstrate a sufficient legal basis for **JOSE GARCIA-NUNEZ**'s plea of guilty to the charged offense.

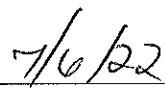
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the Department of Homeland Security confirmed the documents used by NUNEZ during the intake process were fraudulent. The social security number used by NUNEZ during the application process was a valid number but belonged to another individual. After confirming the misuse of the social security number, special agents confronted NUNEZ at the GCSC in St. Rose, and NUNEZ admitted fraudulently using a social security number that did not belong to him to obtain employment with Company "A".


In summary, all of the evidence introduced at trial would have established the elements of the offense and proven the defendant's guilt beyond a reasonable doubt.

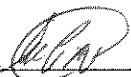
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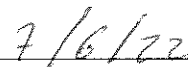
  
RICHARD R. PICKENS, II  
Assistant United States Attorney

  
Date

  
SAMUEL J. SCILLITANI, JR.  
Counsel for Jose Garcia-Nunez

  
Date

  
JOSE GARCIA-NUNEZ  
Defendant

  
Date