

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>ALTAGRACIA ARIAS,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "A.S."</b>	<b>:</b>	<b>18 U.S.C. § 1542 (passport fraud – 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 1542 (use of fraudulently</b>
	<b>:</b>	<b>obtained passport – 4 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
	<b>:</b>	<b>theft – 1 count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

Between on or about November 29, 2008, and on or about January 16, 2009, in the Lehigh Valley, in the Eastern District of Pennsylvania, defendant

**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly and willfully made false statements in an application for a United States passport; with intent to induce and secure for her own use, the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant ARIAS stated that her name was "A.S." (a person whose name is known to the grand jury), that she was born in Puerto Rico, and was, therefore, a United States citizen, and that her Social Security Number was XXX-XX-6552, (which number is known to the grand jury), which statements she knew to be false.

In violation of Title 18, United States Code, Section 1542.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 8, 2013, in Boston, in the District of Massachusetts,  
defendant

**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly and willfully used a United States passport, which she had previously obtained by the making of false statements, namely by using the fraudulently-obtained passport for identification when flying from Boston, MA, to Santo Domingo, Dominican Republic.

In violation of Title 18, United States Code, Section 1542.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 26, 2013, in Boston, in the District of Massachusetts,  
defendant

**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly and willfully used a United States passport, which she had previously obtained by the making of false statements, namely by using the fraudulently-obtained passport for identification when flying from Santo Domingo, Dominican Republic, to Boston, MA.

In violation of Title 18, United States Code, Section 1542.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 1, 2015, in Boston, in the District of Massachusetts, defendant

**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly and willfully used a United States passport, which she had previously obtained by the making of false statements, namely by using the fraudulently-obtained passport for identification when flying from Boston, MA, to Santo Domingo, Dominican Republic.

In violation of Title 18, United States Code, Section 1542.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 14, 2015, in Boston, in the District of Massachusetts, defendant

**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly and willfully used a United States passport, which she had previously obtained by the making of false statements, namely by using the fraudulently-obtained passport for identification when flying from Santo Domingo, Dominican Republic, to Boston, MA.

In violation of Title 18, United States Code, Section 1542.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about August 8, 2013, and on or about February 24, 2016, in the  
District of Massachusetts, defendant

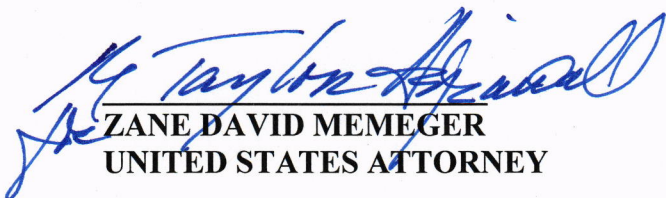
**ALTAGRACIA ARIAS,  
a/k/a "A.S.,"**

knowingly possessed and used, without lawful authority, means of identification, that is the name  
and date of birth of A.S., during and in relation to the use of a fraudulently obtained United  
States passport.

In violation of Title 18, United States Code, Section 1028A.

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**