

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>16-_____</u>
v.	:	DATE FILED: _____, 2016
JOSE ALTAGRACIA	:	VIOLATIONS:
MORALES SANTIAGO,	:	18 U.S.C. § 371 (conspiracy - 1 count)
a/k/a "Lobo,"	:	18 U.S.C. § 1028A (aggravated identity
a/k/a "Jesus Armando Rodriguez,"	:	theft – 1 count)
a/k/a "Jose Angel Rivera Rodriguez,"	:	18 U.S.C. § 1028(a)(1) (producing an
a/k/a "Miguel Sanchez,"	:	identification document -1 count)
JOSE JHONKELLYN	:	18 U.S.C. § 2 (aiding & abetting)
CASTILLO-HENRIQUEZ,	:	Notice of Forfeiture
a/k/a "Jhonkelin Castillo,	:	
HIRAM MOJICA,	:	
a/k/a "Hiran Mojica,"	:	
a/k/a "Carlos Diaz,"	:	
a/k/a "Pedro Gomez,"	:	
a/k/a "Ivan Flores,"	:	
a/k/a "Carlos Mohica"	:	

INDICTMENT

COUNT ONE

THE GRAND JURY ATTORNEY CHARGES THAT:

1. From in or about February 2016 through in or about May 2016, in the Eastern District of Pennsylvania, defendants

JOSE ALTAGRACIA MORALES SANTIAGO,
a/k/a "Lobo,"
a/k/a "Jesus Armando Rodriguez,"
a/k/a "Miguel Sanchez,"
a/k/a "Jose Angel Rivera Rodriguez,"
JOSE JHONKELLYN CASTILLO-HENRIQUEZ,
a/k/a "Jhonkelin Castillo," and
HIRAM MOJICA,
a/k/a "Hiran Mojica,"

**a/k/a "Carlos Diaz,"
a/k/a "Pedro Gomez,"
a/k/a "Ivan Flores,"
a/k/a "Carlos Mohica"**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly and without lawful authority produce, and aid and abet the production of, an identification document, that is, a driver's license, in violation of Title 18, United States Code, Section 1028(a)(1), and to knowingly and without lawful authority use a means of identification of another person during and in relation to the unlawful production of a driver's license, in violation of Title 18, United States Code, Section 1028A(a)(1).

MANNER AND MEANS

2. It was part of the conspiracy that defendants JOSE ALTAGRACIA MORALES SANTIAGO, JOSE JHONKELLYN CASTILLO-HENRIQUEZ, and others known and unknown to the grand jury illegally obtained, attempted to obtain, and aided and abetted the obtaining of, the names, dates of births, social security numbers, and other means of identification of Puerto Rican citizens, which personal identifying information defendants MORALES SANTIAGO and CASTILLO-HENRIQUEZ sold to undocumented aliens, that is, aliens present in the United States without permission or authorization and without necessary documents, in order to enrich themselves.

It was further a part of the conspiracy that:

3. Defendants JOSE ALTAGRACIA MORALES SANTIAGO, JOSE JHONKELLYN CASTILLO-HENRIQUEZ, HIRAM MOJICA, and others known and unknown to the grand jury fraudulently obtained, attempted to obtain, and aided and abetted the obtaining of, learner's permits and driver's licenses from Pennsylvania Department of Transportation

(PennDOT) Department of Motor Vehicles (DMV) locations in and around Philadelphia, Pennsylvania, which defendants MORALES SANTIAGO and CASTILLO-HENRIQUEZ sold to undocumented aliens in order to enrich themselves. To that end:

a. Defendants JOSE ALTAGRACIA MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ advertised having for sale both driver's licenses and identification documents.

b. Defendant JOSE ALTAGRACIA MORALES SANTIAGO fraudulently obtained driving learner's permits from DMVs located in and around Philadelphia, Pennsylvania, in part by paying others known and unknown to the grand jury to take the written knowledge test portion of the driving test using Puerto Rican identities, fraudulent utility bills, and fraudulent medical reports, all of which defendant MORALES SANTIAGO provided.

c. On behalf of undocumented aliens who had purchased learner's permits and identification documents from defendants JOSE ALTAGRACIA MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ, defendant HIRAM MOJICA scheduled driving tests at DMVs located in and around Philadelphia, Pennsylvania.

d. Defendant HIRAM MOJICA instructed undocumented aliens how to use and drive an automobile, provided undocumented aliens with a car to use during driving tests, drove undocumented aliens to DMVs located in and around Philadelphia, Pennsylvania, chaperoned undocumented aliens through the DMV procedures, and directed undocumented aliens to falsify documentation supporting their driver's license applications. In exchange for defendant MOJICA's services, defendants JOSE ALTAGRACIA MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ paid him a fee.

e. Defendant JOSE ALTAGRACIA MORALES SANTIAGO

instructed undocumented aliens applying for driver's licenses to request that PennDOT mail their driver's licenses to one of several different addresses located within a few blocks of each other in Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, defendants JOSE ALTAGRACIA MORALES SANTIAGO, JOSE JHONKELLYN CASTILLO-HENRIQUEZ, HIRAM MOJICA, and others known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania:

1. In a telephone conversation with Person #1, known to the grand jury, on or about February 11, 2016, defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ stated that he is able to fraudulently obtain authentic driver's licenses and explained the steps required to obtain a driver's license. During this same discussion, defendant CASTILLO-HENRIQUEZ told Person #1 that his contact, later identified as defendant HIRAM MOJICA, would assist them in scheduling and practicing for the driving test.

2. In a telephone conversation with Person #1 on or about February 14, 2016, defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ explained how his associate in Philadelphia, Pennsylvania, later identified as defendant JOSE ALTAGRACIA MORALES SANTIAGO, is able to fraudulently obtain driver's licenses. During that same conversation, defendant CASTILLO-HENRIQUEZ stated that he and defendant JOSE ALTAGRACIA MORALES SANTIAGO charge approximately \$2,500.00 for a driver's license, and charge an additional \$2,500.00 fee for identification documents.

3. On or about March 16, 2016, a co-conspirator unknown to the grand jury took the written knowledge test portion of the driving test at a DMV located in Huntingdon Valley, Pennsylvania, using the personal identifying information for R.C.O., a Puerto Rican citizen. Prior to taking the test, this unknown co-conspirator provided DMV personnel with fraudulent utility bills and a fraudulent medical report, all in R.C.O.'s name.

4. On or about March 19, 2016, defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ sent Person #1 by text message two photographs showing a social security card, birth certificate, and signed learner's permit, all in R.C.O.'s name.

5. On or about March 25, 2016:

a. Defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ sent a text message to Person #1 in which defendant CASTILLO-HENRIQUEZ stated that he had for sale another identity provided by defendant JOSE ALTAGRACIA MORALES SANTIAGO.

b. Defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ sent by text message to Person #1 photographs of a birth certificate, social security card, and signed PA learner's permit for C.O.A., a Puerto Rican citizen.

6. On or about March 29, 2016:

a. Defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ and Person #1 traveled from New York, New York to Philadelphia, Pennsylvania.

b. Defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ directed Person #1 and Person #2, known to the grand jury, to the Philadelphia, Pennsylvania apartment in which defendant JOSE ALTAGRACIA MORALES SANTIAGO resided.

c. Person #1 handed defendant JOSE JHONKELLYN CASTILLO-HENRIQUEZ an envelope containing \$5,000.00 in cash.

d. During a meeting inside defendant JOSE ALTAGRACIA MORALES SANTIAGO's apartment, defendants MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ explained that they obtain identification documents of Puerto Rican citizens, and pay to have those identities "cleansed," that is, checked to make sure that there are no criminal records, outstanding tickets, or previously issued driver's licenses associated with them.

e. During the meeting inside his apartment, defendant JOSE ALTAGRACIA MORALES SANTIAGO handed Person #2 a Pennsylvania driving learner's permit, birth certificate, and social security card, all in R.C.O.'s name.

f. During the meeting inside defendant JOSE ALTAGRACIA MORALES SANTIAGO's apartment, defendants MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ explained to Person #2 that Person #2 will receive his driver's license so long as he follows the instructions provided by defendant HIRAM MOJICA.

g. Defendant HIRAM MOJICA and Person #2 drove in defendant MOJICA's car to a parking lot located near the DMV in Norristown, Pennsylvania, where defendant MOJICA provided Person #2 with a driving lesson.

h. Person #2 handed defendant HIRAM MOJICA \$100 in cash that was provided by defendants JOSE ALTAGRACIA MORALES SANTIAGO and JOSE JHONKELLYN CASTILLO-HENRIQUEZ.

i. Defendant HIRAM MOJICA drove Person #2 to the driving center in Norristown, Pennsylvania.

j. Defendant HIRAM MOJICA asked Person #2 if he knew his social security number and address, that is, R.C.O.'s identifying information.

k. Defendant HIRAM MOJICA instructed Person #2 that when completing the paperwork at the DMV, Person #2 would not have to sign his name exactly the same as it appeared in the identification documents that Person #2 purchased from defendants JOSE ALTAGRACIA MORALES SANTIAGO, JOSE JHONKELLYN CASTILLO-HENRIQUEZ.

l. Using defendant HIRAM MOJICA's car, Person #2 took and passed the driving test, and afterward received a temporary driver's license in R.C.O.'s name and bearing Person #2's photograph.

7. On or about April 30, 2016:

a. While inside defendant JOSE ALTAGRACIA MORALES SANTIAGO's residence, defendant MORALES SANTIAGO showed Persons #s 1 and 2 a birth certificate, social security card, and learner's permit, which he offered to sell for \$6,500.00. Additionally, defendant MORALES SANTIAGO told Person #s 1 and 2 that he had additional sets of documents for individuals ranging in ages from 24 to 52, which defendant MORALES SANTIAGO likewise offered to sell for \$6,500.00.

b. Defendant JOSE ALTAGRACIA MORALES SANTIAGO arranged for one of his associates, a female known to the grand jury, to escort Persons #s 1 and 2 to a driving center located in Philadelphia, Pennsylvania, where Person #2 received a driver's license bearing Person #2s's photograph and issued in R.C.O.'s name.

8. On or about May 10, 2016, defendant JOSE ALTAGRACIA MORALES SANTIAGO sent Person #1 a text message via the WhatsApp mobile messaging service of photographs showing birth certificates, social security cards, and Pennsylvania learner's permits for two Puerto Rican citizens.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about February 2016 through in or about May 2016, in the Eastern District of Pennsylvania, defendants

JOSE ALTAGRACIA MORALES SANTIAGO,
a/k/a "Lobo,"
a/k/a "Jesus Armando Rodriguez,"
a/k/a "Miguel Sanchez,"
a/k/a "Jose Angel Rivera Rodriguez,"
JOSE JHONKELLYN CASTILLO-HENRIQUEZ,
a/k/a "Jhonkelin Castillo," and
HIRAM MOJICA,
a/k/a "Hiran Mojica,"
a/k/a "Carlos Diaz,"
a/k/a "Pedro Gomez,"
a/k/a "Ivan Flores,"
a/k/a "Carlos Mohica"

knowingly and without lawful authority produced, and aided and abetted and willfully caused the production of, identification documents, including, but not limited to, a Pennsylvania driver's license in the name of R.C.O., thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(1), (c)(3)(A), (c)(3)(B), and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about March 2016 through in or about April 2016, in the Eastern District of Pennsylvania, defendants

JOSE ALTAGRACIA MORALES SANTIAGO,
a/k/a "Lobo,"
a/k/a "Jesus Armando Rodriguez,"
a/k/a "Miguel Sanchez,"
a/k/a "Jose Angel Rivera Rodriguez,"
JOSE JHONKELLYN CASTILLO-HENRIQUEZ,
a/k/a "Jhonkelin Castillo," and
HIRAM MOJICA,
a/k/a "Hiran Mojica,"
a/k/a "Carlos Diaz,"
a/k/a "Pedro Gomez,"
a/k/a "Ivan Flores,"
a/k/a "Carlos Mohica"

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of R.C.O., during and in relation to the unlawful production of an identification document, that is, a driver's license.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1028(a)(1) as set forth in Count Two of this indictment, defendants

**JOSE ALTAGRACIA MORALES SANTIAGO,
a/k/a "Lobo,"
a/k/a "Jesus Armando Rodriguez,"
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a/k/a "Jose Angel Rivera Rodriguez,"
JOSE JHONKELLYN CASTILLO-HENRIQUEZ,
a/k/a "Jhonkelin Castillo," and
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a/k/a "Ivan Flores,"
a/k/a "Carlos Mohica"**

shall forfeit to the United States of America any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violations, any personal property used or intended to be used to commit the offenses, and all illicit authentication features, identification documents, document-making implements, and means of identification.

2. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1) and 1028(g), incorporating Title 21, United States Code § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 1028(b)(5), and 1028(h).

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney