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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

JEFFERSON B. SESSIONS
Attorney General of the United States
JOHN C. ANDERSON
United States Attorney
SEAN J. SULLIVAN
Special Attorney
U.S. Department of Justice
U.S. Attorney's Office, District of New Mexico
201 Third Street, NW, Suite 900
Albuquerque, New Mexico 87102
Telephone: (505) 224-1514
E-mail: sean.j.sullivan@usdoj.gov
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Rm(BPV)

CR18-1309TUC

United States of America,

INDICTMENT

Plaintiff,

v.

Marivel Cantu-Madril,

Defendant.

VIOLATIONS:

18 U.S.C. § 1341 (Mail Fraud); 18
U.S.C. § 2 (Aiding and Abetting)
Count 1

18 U.S.C. § 505 (Forgery of
Judicial Signature); 18 U.S.C. § 2
(Aiding and Abetting)
Counts 2-3

THE GRAND JURY CHARGES:

COUNT 1

Background

1. Defendant MARIVEL CANTU-MADRIL (hereinafter, "CANTU-MADRIL") was admitted to the State Bar of Arizona on or about May 18, 2006. For several years, she practiced immigration and criminal defense law in Tucson, Arizona.

2. Jane Doe 1 is currently a resident of Arizona. She previously entered the United States illegally on or after February 13, 2008, without the permission or authority of the United States government. On December 13, 2010, immigration officials detained Jane Doe

1 in Pima County, Arizona. However, she currently has lawful residency in the United States.

The Scheme and Artifice

3
4 3. CANTU-MADRIL previously represented Jane Doe 1 in immigration matters arising after Jane Doe's detention. During this representation, CANTU-MADRIL prepared
5 an "I-765, Application for Employment Authorization" on Jane Doe 1's behalf. The
6 purpose of the I-765 application was to obtain an employment authorization document from
7 the federal government so that Jane Doe 1 could work legally in the United States.

8
9 4. CANTU-MADRIL knowingly and intentionally entered false information on Jane Doe 1's application. CANTU-MADRIL entered this false information for the purpose of
10 improving Jane Doe's chances of being approved for the application. Specifically,
11 CANTU-MADRIL stated that Jane Doe 1 had last entered the United States on February 10,
12 2000, in Nogales, Arizona. However, Jane Doe 1 entered the United States on or after
13 February 13, 2008. CANTU-MADRIL knew the information in Jane Doe 1's application
14 about Jane Doe 1's date of last entry was false.

15
16 5. CANTU-MADRIL also falsely stated in Jane Doe's application that Jane Doe 1 entered the United States as a lawful "visitor" and remained a lawful "visitor" at the time of
17 the application. However, CANTU-MADRIL knew from representing Jane Doe after her
18 detention by immigration officials in 2010 that Jane Doe 1 was not a lawful visitor.

19
20 6. CANTU-MADRIL and Jane Doe 1 signed Jane Doe 1's application for employment authorization on or about December 5, 2013. Soon thereafter, CANTU-
21 MADRIL mailed the application, or caused the application to be mailed, to United States
22 Citizenship and Immigration Services in Phoenix, Arizona.

Execution of the Scheme and Artifice

24
25 7. On or about December 5, 2013, in Pima County, in the District of Arizona, and elsewhere, the defendant, MARIVEL CANTU-MADRIL, having knowingly and
26 intentionally devised and engaged in a scheme and artifice to defraud, did mail and cause to
27 be mailed for the purpose of executing said scheme and artifice to defraud, to wit, an I-765,

1 Application for Employment Authorization, for Jane Doe 1, in violation of 18 U.S.C. § 1341,
2 and 18 U.S.C. § 2.

3 **COUNT 2**

4 Between April 29, 2014, and July 31, 2014, in Pima County, in the District of
5 Arizona, and elsewhere, the defendant, MARIVEL CANTU-MADRIL, forged the
6 signature of an officer of a court of the United States, to wit: Joan Ryan, a deputy clerk of
7 the United States Court of Appeals for the Ninth Circuit, for the purpose of authenticating
8 a proceeding and document, a receipt for payment, knowing such signature to be false and
9 counterfeit, in violation of 18 U.S.C. § 505, and 18 U.S.C. § 2.

10 **COUNT 3**

11 Between March 6, 2014, and October 31, 2014, in Pima County, in the District of
12 Arizona, and elsewhere, the defendant, MARIVEL CANTU-MADRIL, forged the
13 signature of an officer of a court of the United States, to wit: Joan Ryan, a deputy clerk
14 of the United States Court of Appeals for the Ninth Circuit, for the purpose of
15 authenticating a proceeding and document, a receipt for payment, knowing such
16 signature to be false and counterfeit, in violation of 18 U.S.C. § 505, and 18 U.S.C. § 2.

17 **A TRUE BILL**

18 **/ s /**

19 _____
20 Presiding Juror

21 JEFFERSON B. SESSIONS
22 Attorney General of the United States
23 JOHN C. ANDERSON
24 United States Attorney
25 District of New Mexico

26 **/ s /**

27 _____
28 Sean J. Sullivan
Special Attorney
U.S. Department of Justice
U.S. Attorney's Office, District of New Mexico

REDACTED FOR
PUBLIC DISCLOSURE

JUL 03 2018