

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
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 :
 v. : Cr. No 18-104-JJM-PAS
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 :
 OCTAVIO ANDRES DIFO-CASTRO, :
 PATRICIA A. PERALTA, :
 ISRAEL ARANA RUIZ VELASCO, :
 ANGEL L. MORALES, :
 YENESIA PUJOLS :
 YAFIRA RODRIGUEZ :
 :
 Defendants :

FILED
FEB 08 2019
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

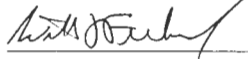
MOTION TO SEAL SECOND SUPERSEDING INDICTMENT

The Government hereby moves for an Order sealing the indictment and related documents. The Government avers that disclosure of the indictment or related documents is likely to cause the defendants to flee and avoid prosecution. The Government further requests that the Order allow the Government to enter the arrest warrants related to this indictment into state and national criminal databases to facilitate the prompt apprehension of the defendants. Additionally, the Government requests that the Order allow the limited disclosure of the existence of the indictment and related arrest warrants to state prosecutors assisting in the investigation of this case.

UNITED STATES OF AMERICA

AARON L. WEISMAN
UNITED STATES ATTORNEY

By:



William J. Ferland
Assistant United States Attorney

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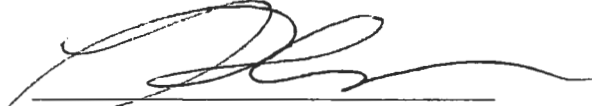
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ORDER

This matter came on to be heard this 6th day of February, 2019 relative to the Government’s Motion to Seal Second Superseding Indictment. After due consideration thereon it is hereby

ORDERED, ADJUDGED and DECREED

This indictment and related documents are hereby sealed. The Government may however disclose the existence of the indictment and related arrest warrants such as may be necessary to enter the warrants into state and national criminal databases and to state and federal law enforcement officers assisting in the apprehension and prosecution of defendants.



LINCOLN D. ALMOND
U.S. Magistrate Judge

2/06/2019
Date

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

OCTAVIO ANDRES DIFO-
CASTRO,

PATRICIA A. PERALTA,

ISRAEL ARANA RUIZ VELASCO,

ANGEL L. MORALES

YENESIA PUJOLS

YAFIRA RODRIGUEZ
Defendants.

Criminal Case No. 18-104-JJM-PAS

In Violation of:

18 U.S.C. § 1029(b)(2);

18 U.S.C. § 1028(A)(1) and (c)(4);

18 U.S.C. § 1343

18 U.S.C. § 371

42 U.S.C. § 408(a)(7)(B)

18 U.S.C. § 1349

18 U.S.C. § 1344(2)

18 U.S.C. § 2

FILED

FEB 08 2019

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT I

(Conspiracy to commit access device fraud)

Between June 1, 2016 and June 1, 2017, in the District of Rhode Island and elsewhere, the defendants, OCTAVIO ANDRES DIFO CASTRO and PATRICIA A. PERALTA, did knowingly and willfully combine, conspire, confederate and agree along with others known and unknown to the grand jury, to commit violations of 18 U.S.C. §1029(a)(1), namely to knowingly and with intent to defraud use a counterfeit access device, that is various customer charge account numbers of various Kohl's Department Store customers.

Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, at least one of the coconspirators committed and caused to be committed, in the District of Rhode Island and elsewhere, at least one of the following acts, among others:

1. Between June 1, 2016 and June 1, 2017, the defendants, while in Rhode Island, without authorization, obtained the personal identification information of, among others, Margaret P., Cynthia W., Amanda P., Roxanne S., Lesley L. and Kerri C.

2. Between June 1, 2016 and June 1, 2017, the defendants, while in Rhode Island, created fraudulent identification documents purporting to be, among others, the Pennsylvania driver's license of Roxanne S. and the Rhode Island driver's licenses of Margaret P. Cynthia W., Lesley L., Kerri C. and Amanda P.

3. On January 12, 2017, G. B., an unindicted coconspirator, travelled to the Kohl's Department Store in Seekonk, Massachusetts, whereupon she selected various items for purchase. She then approached the register and requested the sales associate perform an account look-up claiming she did not have physical possession of her Kohl's credit card. She presented a Rhode Island driver's license in the name of Margaret P. that displayed Margaret P.'s date of birth and a license number of 5486695. The license was counterfeit and the transaction was conducted without the knowledge or consent of Margaret P.

4. On January 12, 2017, an unindicted coconspirator travelled to the Kohl's

Department Store in Smithfield, Rhode Island, whereupon she selected various items for purchase. She then approached the register and requested the sales associate perform an account look-up claiming she did not have physical possession of her Kohl's credit card. She presented a Rhode Island driver's license in the name of Margaret P. that displayed Margaret P.'s date of birth and a license number of 5486695. The license was counterfeit and the transaction was conducted without the knowledge or consent of Margaret P.

5. On February 10, 2017, PATRICIA A. PERALTA travelled to the Kohl's Department Store in Seekonk, Massachusetts, whereupon she selected various items for purchase. She thereafter approached the register and requested the sales associate perform an account look-up claiming she did not have physical possession of her Kohl's credit card. She presented a Rhode Island driver's license in the name of Lesley L. that displayed Lesley L.'s date of birth and a license number of 5532981. The license was counterfeit and the transaction conducted without the knowledge or consent of Lesley L.

6. On February 21, 2017, PATRICIA A. PERALTA travelled to Kohl's Department Store located in Smithfield, Rhode Island, whereupon she approached the register and requested the sales associate perform an account look-up claiming she did not have physical possession of her Kohl's credit card. She was asked for her driver's license at which time she left the store without merchandise.

7. On February 22, 2017, PATRICIA A. PERALTA travelled to Kohl's

Department Stores located in Lisbon, Mansfield, Willimantic and Killingly, Connecticut whereupon she selected various items for purchase. She thereafter approached registers in those Kohl's stores and requested that the sales associates perform account look-ups claiming she did not have physical possession of the respective Kohl's credit cards. She presented counterfeit driver's licenses that contained the dates of birth of the customers. These licenses were counterfeit and the transactions were conducted without the knowledge or consent of the card holders.

8. On March 5, 2017, PATRICIA A. PERALTA travelled to the Kohl's Department Store in Plymouth, Massachusetts, whereupon she selected various items for purchase. She thereafter approached the register and requested the sales associate perform an account look-up claiming she did not have physical possession of her Kohl's credit card. She presented a Rhode Island driver's license in the name of Amanda P. that displayed Amanda P.'s date of birth. The license bearing Rhode Island license number 5532981 was counterfeit and the transaction was conducted without the knowledge or consent of Amanda P.

9. On March 5, 2017, PATRICIA A. PERALTA travelled to Kohl's Department Store in Mansfield, Massachusetts, whereupon she selected various items for purchase. She thereafter approached the register and requested the sales associate perform an account look-up claiming that she did not have physical possession of her Kohl's credit card. She presented a Rhode Island driver's license in the name of Cynthia W. that displayed Cynthia W's date of birth. The license bearing Rhode Island license

number 5532981 was counterfeit and the transaction conducted without the knowledge or consent of Cynthia W.

10. On April 10, 2017, PATRICIA A. PERALTA travelled to Kohl's Department Store in Yardley, Pennsylvania, whereupon she selected various items for purchase. She thereafter approached the register and requested the sales associate perform an account look-up claiming that she did not have physical possession of her Kohl's credit card. She presented a Pennsylvania driver's license in the name of Roxanne S. displaying Roxanne S's date of birth and a license number of 24857793. The license was counterfeit and the transaction was conducted without the knowledge or consent of Roxanne S.

All in violation of 18 U.S.C. § 1029(b)(2).

COUNT II
(aggravated identity theft)

On or about January 12, 2017, in the District of Rhode Island and elsewhere, the defendant, OCTAVIO ANDRES DIFO CASTRO along with G.B., an unindicted coconspirator, during and in relation to the commission of access device fraud, in violation of 18 U.S.C. § 1029(a)(2), did knowingly possess and use without lawful authority, a means of identification of another person, that is, the name and date of birth of "Margaret P.",

All in violation of 18 U.S.C. §§ 1028A(a)(1) and (c)(4) and 2.

COUNT III
(aggravated identity theft)

On or about February 10, 2017, in the District of Rhode Island and elsewhere, the defendants, OCTAVIO ANDRES DIFO CASTRO and PATRICIA A. PERALTA, during and in relation to the commission of access device fraud, in violation of 18 U.S.C. § 1029(a)(2), did knowingly possess and use without lawful authority, a means of identification of another person, that is, the name and date of birth of “Lesley L.”,

All in violation of 18 U.S.C. §§ 1028A(a)(1) and (c)(4) and 2.

COUNT IV

(Conspiracy to Commit Wire Fraud)

Between June 1, 2016 and August 31, 2018, in the District of Rhode Island and elsewhere, the defendants, OCTAVIO ANDRES DIFO-CASTRO, PATRICIA A. PERALTA, ISRAEL ARANA RUIZ VELASCO, YENESIA PUJOLS, G.B., D.W., L.B., and A.M. whose identities are known to the grand jury, did knowingly and willfully combine, conspire, confederate and agree along with others known and unknown to the grand jury, to commit violations of 18 U.S.C. § 1343.

Introduction

1) At all times relevant to the Second Superseding Indictment, Sprint Corporation headquartered in Overland Park, Kansas, was an American telecommunications company that provided wireless services and was an internet

service provider offering wireless cellular telephones for lease and sale, doing business throughout the United States.

2) Sprint Corporation offered its customers the option of enrolling in wireless services and ordering cellular telephones in person at its various retail outlets or through its website. Internet customers could pick up the cellular telephones at Sprint Corporation's local retail outlets.

3) Sprint Corporation required the customer to complete an application process. The customer provided personally identifying information including date of birth and Social Security Number. Based upon a variety of factors, Sprint Corporation would then approve or deny the customer's application.

4) At all times relevant to the Second Superseding Indictment, Honda Lease Trust located in Holyoke, Massachusetts was a wholly owned leasing entity of Honda America, a manufacturer and distributor of Honda automobiles.

5) Honda America offered licensing to automobile dealerships throughout the United States authorizing automobile dealerships to offer Honda automobiles for sale and lease. Honda required potential customers seeking to finance or lease an automobile to supply personally identifying information including their Social Security Number, date of birth, address and place of employment to them through the authorized dealership.

6) Honda dealerships also utilized commercial credit reporting bureaus to determine potential leasee's credit scores and credit worthiness to enter into a lease

with Honda Lease Trust.

7) At all times relevant to the Second Superseding Indictment, Motorcycles of Manchester (MOM's), was a motorcycle dealership authorized to distribute various makes and models of motorcycles including the Polaris Slingshot. Motor Cycles of Manchester maintained various dealerships in Massachusetts and New Hampshire, including Motor Cycles of Manchester in Revere.

8) Motorcycles of Manchester maintained a business relationship with Two Wheeler Finance, a privately owned financing company engaged in vehicle loans for MOM's customers who had substandard credit histories.

9) At all times relevant to the Second Superseding Indictment Pawtucket Credit Union headquartered in Pawtucket, Rhode Island was a financial institution insured by the National Credit Union Administration doing business in Rhode Island and throughout the United States offering, among other services and products, automobile loans to credit worthy customers.

10) At all times relevant to the Second Superseding Indictment The City of Boston Credit Union headquartered in Boston, Massachusetts was a financial institution insured by the National Credit Union Administration doing business in Massachusetts and throughout the United States offering, among other services and products, automobile loans to credit worthy customers.

11) At all times relevant to the Second Superseding Indictment Social Finance, Inc. (SoFi.com) headquartered in San Francisco, California was an online lender doing

business in Rhode Island and throughout the United States offering, among other services and products, personal loans to credit worthy customers.

Object of the Conspiracy

12) The object of the conspiracy was for OCTAVIO ANDRES DIFO-CASTRO, PATRICIA A. PERALTA, ISRAEL ARANA RUIZ VELASCO, YENESIA PUJOLS and others to unlawfully enrich themselves by making false statements, providing false lease applications, false credit applications, counterfeit government identifications and false and counterfeit supporting documentation intended to deceive Sprint, Honda Lease Trust, Two Wheeler Finance, the Pawtucket Credit Union, The City of Boston Credit Union and SoFi.

Acts in Furtherance of the Conspiracy

13) It was part of the scheme to defraud that between June 1, 2016 and August 31, 2018, OCTAVIO ANDRES DIFO-CASTRO, acted with PATRICIA A. PERALTA, ISRAEL ARANA RUIZ VELASCO, YENESIA PUJOLS, Grace B., Andrew M., Donald W. and others to create false and counterfeit government identifications bearing the personal identification information of others without their consent or knowledge which displayed the photograph of coconspirators.

14) PATRICIA A. PERALTA, ISRAEL ARANA RUIZ VELASCO, YENESIA PUJOLS, Grace B., Andrew M., Donald W., L.B and others, between June 1, 2016 and August 31, 2018, acting in concert with OCTAVIO ANDRES DIFO-CASTRO, contacted various business and financial establishments including various Sprint retail outlets and

presented identification documents containing the personal identification information of others without their authorization or by using the personal identification information of others without their consent.

15) Between June 1, 2016 and August 31, 2018 OCTAVIO DIFO-CASTRO took possession of the fraudulently obtained cellular telephones obtained from Sprint which he thereafter sold for profit.

16) On or about March 31, 2017, Donald Wicklund, along with OCTAVIO ANDRES DIFO-CASTRO, made a false and fraudulent application to Honda Lease Trust to lease a 2017 Honda Accord through Grieco Honda an authorized Honda automobile dealership located in Johnston, Rhode Island and did so by supplying a stolen Social Security Number, counterfeit documents, and by making false statements.

17) On or about April 12, 2017, Andrew Marketos, acting in concert with OCTAVIO ANDRES DIFO-CASTRO, made a false and fraudulent application to Pawtucket Credit Union for an automobile loan to purchase a 2017 Honda Accord through Grieco Honda an authorized Honda automobile dealership located in Johnston, Rhode Island utilizing Dealertrack.com and did so by supplying a fraudulent Social Security Number, counterfeit documents, and by making false statements.

18) On or about April 18, 2017, L.B. acting in concert with OCTAVIO DIFO-CASTRO made application for an automobile loan in the amount of \$30,035 with the City of Boston Credit Union located in Boston, Massachusetts and did so by supplying a

stolen Social Security Number and counterfeit documents and by making false statements.

19) On or about April 22, 2017, L.B. acting for OCTAVIO ANDRES DIFO-CASTRO, made application for credit with Motorcycles of Manchester and its related entity, Two Wheeler Finance, using a stolen Social Security number and other counterfeit documents, to purchase a 2016 Polaris Slingshot vehicle.

20) On or about May 18 2017, PATRICIA A. PERALTA and OCTAVIO ANDRES DIFO-CASTRO made application for a lease with Honda Lease Trust to lease a 2017 Honda CRV sport utility vehicle through Belise Honda automobile dealership located in West Warwick, Rhode Island and did so by supplying a stolen Social Security Number, making false statements and supplying counterfeit documents.

21) On or about April 4, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application for a \$50,000 personal loan to be made with Social Finance, Inc. (SoFi.com) unlawfully using the identity of Stefan Dodd including his date of birth and Social Security number.

22) On or about April 25, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application for a \$45,000 personal loan to be made with Social Finance, Inc. (SoFi.com) unlawfully using the identify of Nereyda Rodriguez including her date of birth and Social Security number.

23) On or about July 20, 2017, OCTAVIO ANDRES DIFO CASTRO caused an

online application for a \$30,000 personal loan to be made with Social Finance, Inc. (SoFi.com) unlawfully using the identity of Manuel T. Correia including his date of birth and Social Security number.

All in violation of 18 U.S.C. § 371.

Count V- XXIII
(Wire Fraud)

Paragraphs 1-23 of Count IV of this At all times relevant to the Second Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

The Scheme

Between June 1, 2016 and August 31, 2018, the defendants, OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, ISRAEL ARANA RUIZ VELASCO, YENESIA PUJOLS and others devised and intended to devise a scheme and artifice to defraud various businesses and financial institutions by knowingly and intentionally obtaining the personal identification information of victims, creating false and counterfeit government identifications with the stolen personal identification information and affixing the photograph of accomplices to the identification. It was further part of the scheme that the defendants, OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, and others assigned real or manufactured Social Security Numbers to actual individuals to create false and misleading credit profiles. Utilizing the stolen personal identification information and the counterfeit government identification the defendants, OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, ISRAEL ARANA RUIZ

VELASCO, YENESIA PUJOLS and others purchased goods on credit or secured extensions of credit from unwitting businesses and financial institutions.

Manner and Means

The manner and means of this scheme are set out more fully above in paragraphs 1-23 of Count IV of the Indictment and are re-alleged and incorporated by reference as though fully set forth herein.

Execution of the Scheme

COUNT	DATE	DEFENDANT	EXECUTION
V	11/02/2016	Octavio Andres Difo Castro and Yenisa Pujols	Caused an electronic communication to be sent containing the personal identification information of Laurie F. from the Sprint Store in Braintree, Massachusetts to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS
VI	11/03/2016	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Mary P. from the Sprint Store in Braintree, Massachusetts to the Sprint computer server located in Lee

			Summit, MO; Reston, VA; and Lenexa, KS
VII	11/08/2016	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Patty L. from the Sprint Store in North Attleboro, Massachusetts to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
VIII	11/09/2016	Octavio Andres Difo Castro and Yenesia Pujols	Caused an electronic communication to be sent containing the stolen personal identification information of Barbara F. from the Sprint Store in North Attleboro, Massachusetts to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
IX	12/02/2016	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Melissa S. from the Sprint Store in Cranston, Rhode Island to the Sprint computer server located in Lee Summit, MO;

			Reston, VA; and Lenexa, KS.
X	12/06/2016	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Charles M. from the Sprint Store in Cranston, Rhode Island to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
XI	12/08/2017	Octavio Andres Difo Castro and Yenesia Pujols	Caused an electronic communication to be sent containing the stolen personal identification information of Denise R. from the Sprint Store in Braintree, Massachusetts to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
XII	01/21/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Nancy C. from the Sprint Store located in North Attleboro, Massachusetts to the Sprint computer server located in Lee

			Summit, MO; Reston, VA; and Lenexa, KS.
XIII	01/22/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Lynda M. from the Sprint Store located in North Attleboro, Massachusetts to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
XIV	03/22/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of James F. from the Sprint Store located in Lincoln, Rhode Island to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
XV	04/08/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Richard S. from the Sprint Store located in North Attleboro, Massachusetts to the Sprint computer

			server located in Lee Summit, MO; Reston, VA; and Lenexa, KS
XVI	05/13/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent containing the stolen personal identification information of Raymond P. from the Sprint Store located in Warwick, Rhode Island to the Sprint computer server located in Lee Summit, MO; Reston, VA; and Lenexa, KS.
XVII	04/12/2017	Octavio Andres Difo Castro	Caused an electronic communication to be sent from Grieco Honda in Johnston, Rhode Island to Honda Lease Trust in Holyoke, Massachusetts.
XVIII	04/18/2017	Octavio Andres Difo Castro	Caused an electronic communication to be made to Fidelity National Information Services, a Florida corporation, from the City of Boston Credit Union in Boston, Massachusetts to Fidelity National Information Services' computer server located in Arkansas.
XIX	04/13/2017	Octavio Andres Difo Castro	Caused an electronic credit application to be made through the

			internet from Pawtucket, Rhode Island to Motor Cycles of Manchester located in Massachusetts.
XX	05/18/2017	Octavio Difo Castro and Patricia Peralta	Caused an electronic communication to be sent from Balise Honda in West Warwick, Rhode Island to Honda Lease Trust in Holyoke, Massachusetts
XXI	07/25/2017	Octavio Andres Difo-Castro	Caused an electronic communication to be sent from Social Finance, Inc. (SoFi) in San Francisco, California to Bethpage Federal Credit Union in Bethpage, New York.
XXII	04/11/2018	Octavio Andres Difo-Castro	Caused an electronic communication to be sent from Social Finance, Inc. (SoFi) in San Francisco, California to KeyBank in Cleveland, Ohio
XXIII	05/03/2018	Octavio Andres Difo-Castro	Caused an electronic communication to be sent from Social Finance, Inc. (SoFi) in San Francisco, California to KeyBank in Cleveland, Ohio

All in violation of 18 U.S.C. §§ 1343, and 2.

COUNT XXIV

(Fraudulent Use of a Social Security Number)

On or about May 18, 2017, the defendants OCTAVIO DIFO-CASTRO and PATRICIA A. PERALTA, in the District of Rhode Island, with the intent to deceive Honda Lease Trust falsely represented to Honda Lease Trust that Social Security Number XXX-XX-2468, a true Social Security Number assigned by the Social Security Administration to another, was PERALTA's.

All in violation of 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2

COUNT XXV

(Conspiracy to Commit Bank Fraud)

Between June 1, 2017 and August 31, 2018, in the District of Rhode Island and elsewhere, the defendants, OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, ANGEL L. MORALES, YENESIA PUJOLS, YAFIRA RODRIGUEZ along with others known and unknown, did knowingly and willfully combine, conspire, confederate and agree to commit Bank Fraud, 18 U.S.C. § 1344(2).

Introduction

1) At all times relevant to the Second Superseding Indictment, TD Bank Headquartered in Cherry Hill, New Jersey, was a financial institution doing business in the District of Rhode Island and elsewhere, whose deposits were insured by the Federal Deposit Insurance Corporation.

2) TD Bank offered its customers banking services including savings and checking accounts and retail loans.

3) TD Bank required new customers to present a valid government

identification and sign a signature card for each new account opened.

4) At all times relevant to the Second Superseding Indictment, KeyBank Headquartered in Cleveland, Ohio was a financial institution doing business throughout the United States whose deposits were insured by the Federal Deposit Insurance Corporation.

5) KeyBank offered its customers banking services including savings and checking accounts and retail loans.

6) KeyBank required new customers to present a valid government identification and sign a signature card for each new account opened.

7) At all times relevant to the Second Superseding Indictment, YAFIRA RODRIGUEZ was employed by KeyBank at its Hartford, Connecticut location as a Personal Banker.

8) At all times relevant to the Second Superseding Indictment, Bethpage Federal Credit Union was a financial institution headquartered in Bethpage, New York, doing business in the District of Rhode Island and elsewhere whose deposits were insured by the National Credit Union Administration.

9) Bethpage Federal Credit Union offered its customers a variety of financial services including checking and savings accounts, used car loans and the ability to apply for such loans through an internet website, online application feature.

10) At all times relevant to the Second Superseding Indictment, Alliant Credit Union was a financial institution headquartered in Chicago, Illinois, doing business in the District of Rhode Island and elsewhere whose deposits were insured by the National Credit Union Administration.

11) Alliant Credit Union offered its customers a variety of financial services including checking and savings accounts, used car loans and the ability to apply for

such loans through an internet website, online application feature.

12) At all times relevant to the Second Superseding Indictment, Pentagon Federal Credit Union was a financial institution headquartered in Alexandria, Virginia, doing business in the District of Rhode Island and elsewhere whose deposits were insured by the National Credit Union Administration.

13) Pentagon Federal Credit Union offered its customers a variety of financial services including checking and savings accounts, used car loans and the ability to apply for such loans through an internet website, online application feature.

14) At all times relevant to the Second Superseding Indictment, Digital Federal Credit Union was a financial institution headquartered in Marlborough, Massachusetts doing business in the District of Rhode Island and elsewhere whose deposits were insured by the National Credit Union Administration.

15) Digital Federal Credit Union offered its customers a variety of financial services including checking and savings accounts, used car loans and the ability to apply for such loans through an internet website, online application feature.

16) At all times relevant to the Second Superseding Indictment, Direct Federal Credit Union was a financial institution headquartered in Needham, Massachusetts doing business in the District of Rhode Island and elsewhere whose deposits were insured by the National Credit Union Administration.

17) Direct Federal Credit Union offered its customers a variety of financial services including checking and savings accounts, used car loans and the ability to apply for such loans through an internet website, online feature.

Object of the Conspiracy

The object of the conspiracy was for OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, ANGEL L. MORALES, YENESIA PUJOLS, YAFIRA RODRIGUEZ, J.R. and others to unlawfully enrich themselves by making false statements, providing counterfeit documents and counterfeit government identifications to TD Bank, KeyBank, Bethpage Federal Credit Union, Alliant Credit Union, Digital Federal Credit Union, Direct Federal Credit Union and Pentagon Federal Credit Union, inducing those institutions to provide OCTAVIO ANDRES DIFO CASTRO, PATRICIA A. PERALTA, ANGEL L. MORALES, YENISIA PUJOLS, YAFIRA RODRIGUEZ, J.R. and others with monies, funds, credits, assets, securities and other property from said financial institutions.

Acts in Furtherance of the Conspiracy

Bethpage Credit Union

18) On June 15, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application, using the stolen personal identification information of Mario G. Lima, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

19) On or about June 15, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application, using the stolen personal identification information of Mario G.

Lima, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for a used car loan for what was represented to be a Ford 150 pickup truck vehicle identification number 1FTEW1EG8FFC25174 with Bethpage Federal Credit Union representing the seller of the motor vehicle to be Patricia A. Peralta.

20) On or about June 16, 2017, Bethpage Federal Credit Union approved the Online used car application made in the name of Mario G. Lima and disbursed a check number 22420116 in the amount of \$46,000 made payable to Patricia A. Peralta.

21) On July 3, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application, using the stolen personal identification information of Robert Rocchio, a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

22) On or about July 5, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application to be made using the stolen personal identification information of Robert Rocchio including a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 for a used car loan with Bethpage Federal Credit Union purportedly for the purchase of a 2015 Chevrolet Corvette VIN 1G1YK2D77F5124612 representing the seller of the car to be Olban Vega.

23) On or about July 11, 2017, Bethpage Federal Credit Union approved the Online used car application made in the name of Robert Rocchio and disbursed a check number 22429656 in the amount of \$55,000 made payable to Olban Vega.

24) On or about July 18, 2017, , OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Manuel T. Correia, including a date of birth of XX/XX/1978 and a Social Security Number of XXX-XX-7879 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

25) On or about July 20, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online used automobile loan application using the stolen personal identification information of Manuel T. Correia, a date of birth of XX/XX/1978 and a Social Security Number of XXX-XX-7879 to be made with Bethpage Federal Credit Union purportedly for the purchase of a 2015 Cadillac Escalade VIN 1GYS4NKJ0FR727539 identifying the seller of the vehicle as Felix J. Diaz.

26) On or about July 20, 2017, OCTAVIO ANDRES DIFO CASTRO caused a facsimile to be sent from Rhode Island to Bethpage Federal Credit Union that included a copy of a counterfeit United States Passport in the name of Manuel T. Correia along with a counterfeit Rhode Island Motor Vehicle Title for a 2015 Cadillac automobile representing the vehicle as owned by Felix J. Diaz.

27) On or about July 20, 2017, Bethpage Federal Credit Union approved the Online used car application made in the name of Manuel T. Correia and disbursed a check number 22433391 in the amount of \$54,000 made payable to Felix J. Diaz.

28) On or about July 26, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Nolberto A.

Moscoso, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-6878 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

29) On or about July 26, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online used automobile loan application using the stolen personal identification information of Nolberto Moscoso, a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-6878 to be made with Bethpage Federal Credit Union purportedly for the purchase of a 2013 Cadillac Escalade VIN 1GYS4CEFXDR305996 identifying the seller of the vehicle as Francisco B. Vazquez.

30) On or about August 1, 2017, Bethpage Federal Credit Union approved the online used car loan application made in the name of Nolberto Moscoso and disbursed a check number 22437861 in the amount of \$40,000 made payable to Francisco B. Vazquez.

Alliant Credit Union

31) On or about June 30, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Robert Rocchio, including a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 to be made for membership with the Alliant Credit Union including checking and savings privileges.

32) On or about July 15, 2017, OCTAVIO ANDRES DIFO CASTRO caused a online used car loan application using the stolen personal identification information of

Robert Rocchio, a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 to be made with Alliant Credit Union for the purchase of a 2015 Chevrolet Corvette VIN 1G1YK2D77F5124612 identifying the seller of the vehicle as Juan Ruiz.

33) On or about July 15, 2017, OCTAVIO ANDRES DIFO CASTRO caused a facsimile to be sent from Rhode Island to Alliant Credit Union that included a copy of a counterfeit Rhode Island driver's license in the name Robert Rocchio along with a counterfeit Rhode Island Motor Vehicle Title for a 2015 Chevrolet automobile representing the vehicle as owned by Juan Ruiz. Alliant Credit Union approved the loan and disbursed a check number 000001493033 in the amount of \$55,000 made payable to Juan Ruiz.

34) On or about August 11, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Hector R. Rosales, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-5103 to be made for membership with the Alliant Credit Union including checking and savings privileges.

35) On or about August 16, 2017, OCTAVIO ANDRES DIFO CASTRO caused An online loan application to be filed using the stolen personal identification information of Hector R. Rosales, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-5103 to be made with Alliant Credit Union for the purchase of a 2013 Cadillac Escalade VIN 1GYS4CEFXDR305996. Alliant approved the loan and disbursed a check number 000001500805 in the amount of \$35,000 made payable to

Hector R. Rosales.

Pentagon Federal Credit Union

36) On or about June 14, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Mario G. Lima, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

37) On or about June 30, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Mario G. Lima, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for a used car loan to purchase what was represented to be a Ford 150 pickup truck vehicle identification number 1FTEW1EG8FFC25174 with the Pentagon Federal Credit Union with the purported seller of the vehicle being Nilka Reyes.

38) On or about June 30, 2017, Pentagon Federal Credit Union approved the loan and disbursed a check number 0003155750 in the amount of \$46,000 made payable to Nilka Reyes and Mario G. Lima.

39) On or about December 13, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Luis Roque, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0912 to be made for membership with the Pentagon Federal Credit Union including checking

and savings privileges.

40) On or about December 13, 2017, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Luis Roque, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0912 to be made for a used car loan to purchase what was represented to be a 2015 Lincoln Navigator vehicle identification number 5LMJJ3JT6FEJ04914 with the Pentagon Federal Credit Union with the purported seller of the vehicle being Alejandro Regalado.

41) On or about December 13, 2017, Pentagon Federal Credit Union approved the Loan and disbursed a check number 0003197216 in the amount of \$44,500 made payable to Alejandro Regalado and Luis Roque.

42) On or about March 12, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Stefan P. Dodd, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-3503 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

43) On or about March 12, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Stefan P. Dodd, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-3503 to be made for a used car loan to purchase what was represented to be a 2015 Infinity vehicle identification number JN8AZ2NC4F9370725 with the Pentagon Federal Credit Union.

44) On or about April 20, 2018, Pentagon Federal Credit Union approved the Loan and disbursed a check number 0003226962 in the amount of \$40,000 made payable to Stefan P. Dodd.

45) On or about July 11, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX- 8878 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

46) On or about July 11, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for to be made for a used car loan to purchase what was represented to be a 2013 Mercedes Benz Roadster vehicle identification number WDDJK7DA9DF000713 with the Pentagon Federal Credit Union.

Digital Federal Credit Union

47) On or about February 27, 2018, OCTAVIO ANDRES DIFO CASTRO caused An online application using the stolen personal identification information of Edward L. Delacruz, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX- 0060 to be made for membership with the Digital Federal Credit Union including checking and savings privileges.

48) On or about March 2, 2018, OCTAVIO ANDRES DIFO CASTRO caused an

online application using the stolen personal identification information of Edward L. Delacruz, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0060 to be made for a used car loan to purchase what was represented to be a 2018 Mercedes Benz vehicle identification number WDC0G4KB0JV018952 with the Digital Federal Credit Union with the purported seller of the vehicle being Stefan P. Dodd.

49) On or about March 2, 2018, Pentagon Federal Credit Union approved the Loan and disbursed a check number 0001531875 in the amount of \$45,000 made payable to Stefan P. Dodd.

50) On or about June 14, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Harold F. Nelson, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-1331 to be made for membership with the Digital Federal Credit Union including checking and savings privileges.

51) On or about June 14, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Harold F. Nelson, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-1972 to be made for a used car loan to purchase what was represented to be a 2015 Ford F150 pickup truck vehicle identification number 1FTEX1EP7FKE55678 with the Digital Federal Credit Union.

52) On or about June 14, 2018, Digital Federal Credit Union approved the loan

and disbursed check number 001542951 in the amount of \$34,000 made payable to Harold F. Nelson.

Direct Federal Credit Union

53) On or about May 31, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Eugenio L. Barros, including a date of birth of XX/XX/1970 and a Social Security Number of XXX-XX-8886 to be made for a savings and checking account with Direct Federal Credit Union.

54) On or about May 31, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Eugenio L. Barros, including a date of birth of XX/XX/1970 and a Social Security Number of XXX-XX-8886 to be made for a used car loan to purchase what was represented to be a 2015 Audi vehicle identification number WA1CGAFE3D001043 with the Direct Federal Credit Union with the purported seller of the vehicle being Geraldo's Foreign Cars.

55) On or about June 1, 2018, Direct Federal Credit Union approved the loan application and disbursed check number 060886 in the amount of \$30,000 made payable to Eugenio L. Barros.

56) On or about June 7, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Nereyda Rodriguez, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-0521 to be made for a savings and checking account with Direct Federal Credit Union.

57) On or about June 7, 2018, OCTAVIO ANDRES DIFO CASTRO caused an

online application using the stolen personal identification information of Nereyda Rodriguez, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-0521 to be made for a used car loan to purchase what was represented to be a 2014 Land Rover vehicle identification number SALWR2WF0EA388767 with the Direct Federal Credit Union with the purported seller of the vehicle being Alyson E. Martinez.

58) On or about June 7, 2018, Direct Federal Credit Union approved the loan and disbursed check number 060875 in the amount of \$34,500 made payable to Nereyda J. Rodriguez.

59) On or about June 13, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Aurelio S. Caetano, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-2280 to be made for a savings and checking account with Direct Federal Credit Union.

60) On or about June 13, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Aurelio S. Caetano, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-2280 to be made for a used car loan to purchase what was represented to be a 2018 Mazda CX-9 vehicle identification number JM3TCBDY0J01037 with the Direct Federal Credit Union with the purported seller of the vehicle being Geraldo's Foreign Cars.

61) On or about June 13, 2018, Direct Federal Credit Union approved the loan and disbursed check number 060989 in the amount of \$35,000 made payable to Aurelio

S. Caetano.

62) On or about June 17, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Sergio A. Aragao, including a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-3084 to be made for a savings and checking account with the Direct Federal Credit Union.

63) On or about June 17, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Sergio A. Aragao, including a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-3084 to be made for a used car loan to purchase what was represented to be a 2015 Dodge Ram pickup truck vehicle identification number 3C6UR5NL1FG6288 with the Direct Federal Credit Union with the purported seller of the vehicle being Geraldo's Foreign Cars.

64) On or about June 18, 2018, Direct Federal Credit Union approved the loan and disbursed check number 060946 in the amount of \$38,000 made payable to Sergio A. Aragao.

65) On or about June 22, 2018, On or about June 17, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Jennifer Alley, including a date of birth of XX/XX/1974 and a Social Security Number of XXX-XX-2492 to be made for a savings and checking account with the Direct Federal Credit Union.

66) On or about June 17, 2018, OCTAVIO ANDRES DIFO CASTRO caused an

online application using the stolen personal identification information of Jennifer Alley, including a date of birth of XX/XX/19777 and a Social Security Number of XXX-XX-2492 to be made for a used car loan to purchase what was represented to be a 2016 Chevrolet Suburban vehicle identification number 1GNSKHKC4GR254042 with the Direct Federal Credit Union with the purported seller of the vehicle being Pamela Daylor.

67) On or about June 18, 2018, Direct Federal Credit Union approved the loan and disbursed check number 061081 in the amount of \$44,000 made payable to Jennifer L. Alley.

68) On or about July 3, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for a savings and checking account with the Direct Federal Credit Union.

69) On or about July 3, 2018, OCTAVIO ANDRES DIFO CASTRO caused an online application using the stolen personal identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for a used car loan to purchase what was represented to be a 2018 Audi with the Direct Federal Credit Union with the purported seller of the vehicle being Quelin Rosario.

70) On or about July 11, 2018, Direct Federal Credit Union approved the loan and disbursed check number 061095 in the amount of \$59,400 made payable to Randall L. Gerber.

TD Bank

71) On June 15, 2017, PATRICIA A. PERALTA and ANGEL L. MORALES entered the TD Bank located in East Providence, Rhode Island. ANGEL L. MORALES, presented a counterfeit Pennsylvania driver's license in the name of Mario G. Lima. ANGEL L. MORALES thereafter provided a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682. PATRICIA A. PERALTA presented a United States passport in her name and supplied an unlawfully obtained Social Security Number of XXX-XX-2468. The two opened a TD Bank checking account number XXXXXX8218.

72) On June 19, 2017, PATRICIA A. PERALTA and ANGEL L. MORALES at East Providence, Rhode Island, caused a \$46,000 check number 22420116, drawn on the Bethpage Federal Credit Union to be deposited into TD Bank checking account number XXXXXX8218.

73) On or about June 30, 2017, ANGEL L. MORALES, entered the TD Bank located in Pawtucket, Rhode Island and presented a counterfeit Pennsylvania driver's license in the name of Mario G. Lima. ANGEL L. MORALES thereafter provided a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 and opened checking account number XXXXXX8259.

74) On or about June 30, 2017, ANGLE L. MORALES, entered the TD Bank located in Pawtucket, Rhode Island, presented a counterfeit Pennsylvania driver's license in the name of Mario G. Lima and deposited TD Bank official check number 31292842-4 in the amount of \$26,460.66 made payable to Mario G. Lima, into TD Bank

checking account number XXXXXX8259.

75) On or about July 7, 2017, J.R., entered the TD Bank located in East Providence, Rhode Island and presented a counterfeit Pennsylvania driver's license in the name of Juan Ruiz. J.R. thereafter provided a date of birth of XX/XX/1981 and a Social Security Number of XXX-XX-1109 and opened a checking account number XXXXXX7781.

76) On July 10, 2017, ANGEL L. MORALES entered the TD Bank located in Pawtucket, Rhode Island and deposited check number 0003155750 in the amount of \$46,000 drawn on the Pentagon Federal Credit Union payable to Nilka D. Ryes and Mario G. Lima into TD Bank checking account number XXXXXX8259.

77) On or about July 12, 2017, J.R., entered the TD Bank located in North Attleboro, Massachusetts and presented a counterfeit Pennsylvania driver's license in the name of Olban Vega. J.R. provided a date of birth of XX/XX/1975 and a Social Security Number of XXX-XX-5035 and opened a checking account number XXXXXX5484.

78) On or about July 13, 2017, J.R., deposited a check number 22429656 in the amount of \$55,000, made payable to Olban Vega drawn on Bethpage Federal Credit Union into TD Bank checking account number XXXXXX5484.

79) On or about July 17, 2017, J.R., entered the TD Bank located in Foxboro, Massachusetts and presented a counterfeit Pennsylvania driver's license in the name of Felix J. Diaz. J.R. provided a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-5078 and opened checking account number XXXXX8471.

80) On July 18, 2017, J.R., deposited a check number 000001493033 in the amount of \$55,000, made payable to Juan Ruiz drawn on Alliant Credit Union into TD Bank checking account number XXXXXX7781.

81) On July 21, 2017, J.R. deposited a check number 22433391 in the amount of \$54,000 drawn on the Bethpage Federal Credit Union payable to Felix Diaz into TD Bank checking account number XXXXX8471.

82) On August 3, 2017, ANGEL L. MORALES, representing himself to be Francisco Vasquez, entered the TD Bank located in Cambridge, Massachusetts and presented a counterfeit Pennsylvania driver's license in the name of Francisco Vasquez. ANGEL MORALES provided a date of birth of XX/XX/1974 and a Social Security Number of XXX-XX-9633 and opened checking account number XXXXXX1164.

83) On August 8, 2017, ANGEL L. MORALES, representing himself to be Francisco Vasquez, entered the TD Bank located in Cambridge, Massachusetts and deposited check number 22437861 in the amount of \$40,000 drawn on the Bethpage Federal Credit Union payable to Francisco B. Vazquez.

84) On August 13, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator, representing himself to be Hector Rosales, to enter the TD Bank located in, Wrentham, Massachusetts and present a counterfeit Rhode Island driver's license in the name of Hector Rosales. The unknown coconspirator provided a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-5103 and opened checking account number XXXXXX7862.

85) On or about August 18, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator, to represent himself to be Hector Rosales, and enter the TD Bank located in Wrentham, Massachusetts and deposit check number 000001500805 in the amount of \$35,000 drawn on the Alliant Credit Union payable to Hector R. Rosales.

86) On or about December 18, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator, representing himself to be Luis Roque, to enter the TD Bank located in Johnston, Rhode Island and present a counterfeit Pennsylvania driver's license in the name Luis Roque. The unknown coconspirator provided a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0912 and opened checking account XXXXXX2577.

87) On or about December 18, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator, to represent himself to be Luis Roque, and enter the TD Bank located in Johnston, Rhode Island and deposit check number 0003197216 in the amount of \$44,500 drawn on the Pentagon Federal Credit Union payable to Luis Roque and Alejandro Regalado.

88) On or about February 22, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator, representing himself to be Stefan P. Dodd, to enter the TD Bank located in Paterson, New Jersey and present a counterfeit Connecticut driver's license in the name Stefan P. Dodd. The unknown coconspirator provided a date of birth of XX/XX/1980 and a Social Security Number of XXX-XX-3503 and opened checking account XXXXXX7432.

89) On or about March 6, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator, to represent himself to be Stefan P. Dodd, and enter the TD Bank located in Bronx, New York and deposit check number 001531875 in the amount of \$45,000 drawn on the Digital Federal Credit Union payable to Stefan P. Dodd.

90) On or about April 9, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator, to represent herself to be Nereyda J. Rodriguez, and enter the TD Bank located in North Bergen, New Jersey and present a counterfeit Connecticut driver's license in the name Nereyda J. Rodriguez. The unknown coconspirator provided a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-0521 and opened checking account XXXXXX0000.

91) On or about May 3, 2018, OCTAVIO ANDRES DIFO CASTRO caused an electronic deposit of \$45,000 fraudulently obtained from Social Finance, Inc. (SoFi.com) to be deposited into the TD Bank checking account XXXXXX0000 opened in the name of Nereyda J. Rodriguez.

Withdrawals from Subject Accounts

92) On June 22, 2017, PATRICIA A. PERALTA entered the TD Bank located in East Providence, Rhode Island whereupon she withdrew \$9500 in cash from TD Bank checking account number XXXXXX8218.

93) On June 29, 2017, PATRICIA A. PERALTA entered the TD Bank located in East Providence, Rhode Island whereupon she withdrew \$36,260.86 from checking

account number XXXXXX8218. \$26,260.86 was in the form of TD Bank official check number 31292842-4 made payable to Mario Lima. The balance of the withdrawal, \$10,000, was in cash.

94) On July 5, 2017, ANGEL L. MORALES entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario G. Lima and withdrew \$9500 in cash from checking account number XXXXXX8259.

95) On July 7, 2017, ANGEL L. MORALES entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario G. Lima and withdrew \$9500 in cash from checking account number XXXXXX8259.

96) On July 14, 2017, J.R., representing himself to be Olban Vega entered the TD Bank located in North Attleboro, Massachusetts whereupon he withdrew \$9500 in cash from TD Bank checking account XXXXXX5484.

97) On July 19, 2017, ANGEL L. MORALES entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario G. Lima and withdrew \$9500 in cash from checking account number XXXXXX8259.

98) On July 19, 2017, J.R., representing himself to be Juan Ruiz, entered the TD Bank located in East Providence, Rhode Island whereupon he withdrew \$9300 in cash from TD Bank checking account XXXXXX7781.

99) On July 19, 2017, ANGEL L. MORALES, entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario G. Lima and withdrew \$9500 in cash from TD Bank checking account XXXXXX8259.

100) On July 21, 2017, J.R., representing himself to be Juan Ruiz, entered the TD Bank located in East Providence, Rhode Island whereupon he withdrew \$9400 in cash from TD Bank checking account XXXXXX7781.

101) On July 22, 2017, J.R., representing himself to be Olban Vega, entered the TD Bank located in Johnston, Rhode Island whereupon he withdrew \$9000 in cash from TD Bank checking account XXXXXX5484.

102) On July 23, 2017, ANGEL L. MORALES, entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario G. Lima and withdrew \$9500 in cash from TD Bank checking account XXXXXX8259.

103) On July 24, 2017, J.R., representing himself to be Juan Ruiz entered the TD Bank located in East Providence, Rhode Island whereupon he withdrew \$8900 in cash from TD Bank checking account XXXXXX7781.

104) On July 24, 2017, J.R., representing himself to be Felix J. Diaz, entered the TD Bank located in Foxboro, Massachusetts whereupon he withdrew \$9200 in cash from TD Bank checking account XXXXXX 8471.

105) On July 24, 2017, ANGEL L. MORALES, entered the TD Bank located in

Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario Lima and withdrew \$9500 in cash from TD Bank checking account XXXXXX8259.

106) On July 25, 2017, J.R., representing himself to be Juan Ruiz, entered the TD Bank located in Johnston, Rhode Island whereupon he withdrew \$9100 in cash from TD Bank checking account XXXXXX5484.

107) On July 26, 2017, ANGEL L. MORALES, entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario Lima and withdrew \$9500 in cash from TD Bank checking account XXXXXX8259.

108) On August 1, 2017, ANGEL L. MORALES entered the TD Bank located in Pawtucket, Rhode Island whereupon he presented a counterfeit Pennsylvania driver's license in the name Mario Lima and withdrew \$9500 in cash from TD Bank checking account XXXXXX8259.

109) On August 22, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the TD Bank located in Wrentham, Massachusetts whereupon the coconspirator represented himself to be Hector R. Rosales and withdrew \$9500 in cash from the TD Bank checking account XXXXXX7862.

110) On August 25, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the TD Bank located in Wrentham, Massachusetts whereupon the coconspirator represented himself to be Hector R. Rosales and

withdrew \$15,000 in cash from the TD Bank checking account XXXXXX7862.

111) On August 29, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the TD Bank located in Wrentham, Massachusetts whereupon the coconspirator represented himself to be Hector R. Rosales and withdrew \$7000 in cash from the TD Bank checking account XXXXXX7862

112) On December 20, 2017, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator to enter the TD Bank located in Johnston, Rhode Island whereupon the conspirator represented himself to be Luis Roque and withdrew \$15,000 in cash from TD Bank checking account XXXXXX2577.

113) On January 2, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator to enter the TD Bank located in Johnston, Rhode Island whereupon the conspirator represented himself to be Luis Roque and withdrew \$9,500 in cash from TD Bank checking account XXXXXX2577.

114) On February 5, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator to enter the TD Bank located in Johnston, Rhode Island whereupon the conspirator represented himself to be Luis Roque and withdrew \$2,200 in cash from TD Bank checking account XXXXXX2577.

115) On March 16, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown conspirator to enter the TD Bank located in Bronx, New York whereupon the conspirator represented himself to be Stefan P. Dodd and withdrew \$ 30,016 from TD Bank checking account XXXXXX7432.

116) On March 22, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the TD Bank located in Bronx, New York whereupon the conspirator represented himself to be Stefan P. Dodd and withdrew \$12,808 from TD Bank checking account XXXXXX7432.

117) On May 10, 2018, OCTAVIO ANDRES DIFO CASTRO caused check number 0098 drawn on account XXXXXX0000 in the name of Nereyda Rodriguez in the amount of \$15,470 made payable to Miami Cuban, to be issued and later presented for payment.

KeyBank

118) On April 2, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unidentified coconspirator to enter the KeyBank located in Hartford, Connecticut and meet with YAFIRA RODRIGUEZ to present a counterfeit driver's license in the name Stefan P. Dodd. The unknown coconspirator thereafter provided a date of birth of XX/XX/1980 and a Social Security Number of XXX-XX-3503 and opened KeyBank checking account number XXXXXXXX7380.

119) On April 11, 2018, OCTAVIO ANDRES DIFO CASTRO caused an electronic deposit of \$50,000 fraudulently obtained from Social Finance, Inc. (SoFi.com) to be deposited into the KeyBank checking account XXXXXX7380 opened in the name of Stefan P. Dodd

120) On April 25, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unidentified coconspirator to represent himself to be Stefan P. Dodd, and enter the KeyBank located in Hartford, Connecticut and deposit check number 001531875 in the

amount of \$45,000 drawn on the Pentagon Federal Credit Union payable to Stefan P. Dodd into KeyBank account XXXXXX7380 opened in the name Stefan P. Dodd.

121) On May 11, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unidentified coconspirator to represent herself to be Pamela Daylor, and enter the KeyBank located in Hartford, Connecticut and meet with YAFIRA RODRIGUEZ to present a counterfeit driver's license in the name Pamela Daylor. The unknown coconspirator thereafter provided a date of birth of XX/XX/1968 and a Social Security Number of XXX-XX-6945 and opened KeyBank checking account number XXXXXX8065.

122) On July 24, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unidentified coconspirator to represent herself to be Pamela L. Daylor, and enter the KeyBank located in Hartford, Connecticut and deposit check number 061081 in the amount of \$44,000 drawn on the Direct Federal Credit Union payable to Jennifer L. Alley and Pamela L. Daylor into KeyBank checking account number XXXXXX8065 opened in the name of Pamela L. Daylor.

123) On June 20, 2018, OCTAVIO ANDRES DIFO CASTRO caused J.R. to represent himself to be Harold F. Nelson, and enter the KeyBank located in Hartford, Connecticut and meet with YAFIRA RODRIGUEZ to present a counterfeit driver's license in the name Harold F. Nelson. J.R. thereafter provided a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-1331 and opened KeyBank checking account number XXXXXX8545 in the name Harold F. Nelson.

124) On June 20, 2018, OCTAVIO ANDRES DIFO CASTRO caused J.R. to represent himself to be Harold F. Nelson and enter the KeyBank located in Hartford, Connecticut and deposit check number 001542951 in the amount of \$34,000 drawn on Digital Federal Credit Union payable to Harold F. Nelson into Keybank checking account XXXXXX8545 in the name Harold F. Nelson.

Withdrawals from Subject Accounts

125) On April 11 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the KeyBank located in Hartford, Connecticut, whereupon the conspirator represented himself to be Stefan P. Dodd and withdrew \$9,500 in cash from TD Bank checking account XXXXXX7380.

126) On April 17, 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the KeyBank located in Hartford, Connecticut, whereupon the conspirator represented himself to be Stefan P. Dodd and withdrew \$9,000 in cash from TD Bank checking account XXXXXX7380.

127) On April 23 2018, OCTAVIO ANDRES DIFO CASTRO caused an unknown coconspirator to enter the KeyBank located in Hartford, Connecticut, whereupon the conspirator represented himself to be Stefan P. Dodd and withdrew \$9,000 in cash from TD Bank checking account XXXXXX7380.

128) On July 2, 2018, OCTAVIO ANDRES DIFO CASTRO caused J.R. to enter the KeyBank located in Hartford, Connecticut, whereupon J.R. represented himself to be Harold F. Nelson and withdrew \$33,000 in the form of a bank check made payable to

Miami Cuban.

All in violation of 18 U.S.C. § 1349

COUNTS XXVI- XXXII

(Bank Fraud)

Scheme to Defraud

Between June 1, 2017 and August 31, 2018, in the District of Rhode Island and elsewhere, the defendants, , along with others known and unknown, did knowingly devise a scheme and artifice to defraud Bethpage Federal Credit Union, Alliant Credit Union, Pentagon Federal Credit Union, Digital Federal Credit Union, Direct Federal Credit Union, KeyBank and TD Bank, all federally insured financial institutions, and to obtain monies, funds, credits, assets, securities and other property from said, financial institutions by means of false and fraudulent pretenses, representation, and promises, to wit using the stolen personal identification information of others and falsely representing himself to be that person, opened checking accounts with TD Bank, KeyBank, Bethpage Federal Credit Union, Alliant Credit Union, Digital Federal Credit Union, Direct Federal Credit Union and Pentagon Federal Credit Union and deposited into the accounts at TD Bank, KeyBank, and others, checks that were fraudulently obtained from Bethpage Federal Credit Union, Alliant Credit Union, Direct Federal Credit Union, Digital Federal Credit Union and Pentagon Federal Credit Union by using the stolen personal identification information of others to apply for fraudulent car loans with Bethpage Federal Credit Union, Alliant Credit Union, Digital Federal Credit

Union, Direct Federal Credit Union and Pentagon Federal Credit Union resulting in a loss to said financial institutions.

Execution of the Scheme

Paragraphs 1-128 of COUNT XXV of this indictment are re-alleged and incorporated by reference as though fully set forth herein.

<u>Count</u>	<u>Date</u>	<u>Defendant</u>	<u>Financial Institution</u>	<u>Means of Executing Scheme to Defraud</u>
XXVI	June 19, 2017	Patricia A. Peralta, Angel L. Morales and Octavio Andres Difo-Castro	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22420116 drawn on the Bethpage Federal Credit Union payable to Patricia A. Peralta.
XXVII	July 10, 2017	Angel Morales, Octavio Andres Difo Castro	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 0003155750 drawn on the Pentagon Federal Credit Union payable to Nilka D. Reyes and Mario G. Lima.
XXVIII	July 13, 2017	Octavio Andres Difo Castro	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22429656 drawn on the Bethpage Federal Credit Union payable to Olban Vega.
XXIX	July 18, 2017	Octavio Andres Difo Castro	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22433391 drawn on the Bethpage Federal Credit Union payable to Juan Ruiz
XXX	July 18,	Octavio	TD Bank	Deposited or caused to be

	2017	Andres Difo Castro		deposited, a fraudulently obtained check number 000001493033 drawn on the Alliant Credit Union payable to Juan Ruiz
XXXX	August 8, 2017	Octavio Andres Difo Castro and Angel L. Morales	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22437861 drawn on the Bethpage Federal Credit Union payable to Francisco B. Vazquez
XXXII	December 18, 2017	Octavio Andres Difo Castro	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 0003197216 drawn on the Pentagon Federal Credit Union payable to Alejandro Regalado and Luis Roque

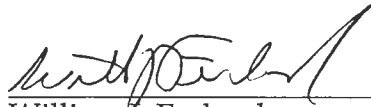
All in violation of 18 U.S. C. § § 1344(2) and 2

COUNT XXXIII

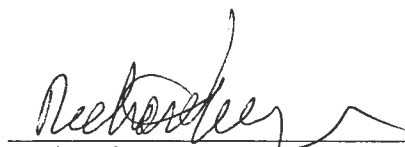
129) On or about June 30, 2017, in the District of Rhode Island and elsewhere, the defendant ANGEL L. MORALES, during and in relation to the commission of bank fraud, in violation of 18 U.S.C. 1344(2), did knowingly possess and use without lawful authority, a means of identification of another person, that is the name, date of birth and Social Security number of Mario G. Lima.

All in violation of 18 U.S.C. §§ 1028A(a)(1) and (c)(4) and 2.

AARON WEISMAN
United States Attorney



William J. Ferland
Assistant U.S. Attorney



Richard B. Myrus
First Assistant U.S. Attorney

Date: 2/6/19

A TRUE BILL:



Grand Jury Foreperson

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. 18-CR-104-01-JJM-PAS

SECOND SUPERSEDING

USA vs.

Defendant: OCTAVIO ANDRES DIFO-CASTRO

Address: 82 Dwight Street
Apt. 3B
Brooklyn, New York

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea SECOND Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Name of District Court, and/or Judge/Magistrate Location (City)
UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM AARON L. WEISMAN
 U.S. Atty Other U.S. Agency
Phone No. (401) 709-5000

Name of Asst. U.S. Attorney (if assigned) WILLIAM J. FERLAND

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
U.S. Secret Service-Brandon Henderson, SA

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.
18-CR-104-01-JJM

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County

Interpreter Required Dialect: SPANISH

Birth Date 11/20/1990 Male Alien
 Female (if applicable)

Social Security Number _____

DEFENDANT

Issue: Warrant Summons

Location Status:

Arrest Date 8/9/2018 or Date Transferred to Federal Custody _____

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): _____

FPD CJA RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 32

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHMENT.		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
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			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Attachment to
Defendant SECOND SUPERSEDING Indictment Relative to a Criminal Action -
In U.S. District Court

Defendant: OCTAVIO ANDRES DIFO-CASTRO

Count I: Conspiracy to commit access device fraud, in violation of 18 U.S.C. §1029(a)(1).

Penalties: 10 years imprisonment, \$250,000 fine and 3 years supervised release.

Count II: Aggravated identity theft, all in violation of 18 U.S.C. § 1028A(a)(1) and (c)(4) and 2.

Penalties: 2 years mandatory imprisonment consecutive to underlying offense.

Count III: Aggravated identity theft, all in violation of 18 U.S.C. § 1028A(a)(1) and (c)(4) and 2.

Penalties: 2 years mandatory imprisonment consecutive to underlying offense.

Count IV: Conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1343.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Counts V-XXIII: Wire fraud, all in violation of 18 U.S.C. §§ 1343, and 2.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Count XXIV: Fraudulent use of a social security number, in violation of 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2.

Penalties: 5 years imprisonment, \$250,000 fine and 3 years supervised release.

Count XXV: Conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

Counts XXVI-XXXII: Bank Fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

Attachment to
Defendant SECOND SUPERSEDING Indictment Relative to a Criminal Action –
In U.S. District Court

Defendant: PATRICIA PERALTA

Count I: Conspiracy to commit access device fraud, in violation of 18 U.S.C. §1029(a)(1).

Penalties: 10 years imprisonment, \$250,000 fine and 3 years supervised release.

Count III: Aggravated identity theft, all in violation of 18 U.S.C. § 1028A(a)(1) and (c)(4) and 2.

Penalties: 2 years mandatory imprisonment consecutive to underlying offense.

Count IV: Conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1343.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Counts XX: Wire fraud, all in violation of 18 U.S.C. §§ 1343, and 2.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Count XXIV: Fraudulent use of a social security number, in violation of 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2.

Penalties: 5 years imprisonment, \$250,000 fine and 3 years supervised release.

Count XXV: Conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

Count XXVI: Bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION **INDICTMENT** COMPLAINT

CASE NO. 18-CR-104-JJM-PAS
SECOND SUPERSEDING

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea **Second Superseding Indictment** Defendant Added
 Information Charges/Counts Added

USA vs.

Defendant: ISRAEL ARANA RUIZ VELASCO

Name of District Court, and/or Judge/Magistrate Location (City)

Address: Unknown

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM AARON L. WEISMAN
 U.S. Atty Other U.S. Agency
Phone No. (401) 709-5000

Interpreter Required Dialect: _____

Name of Asst. U.S. Attorney (if assigned) WILLIAM J. FERLAND

Birth Date 1/19/1994 Male Alien
 Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
U.S. Secret Service-Brandon Henderson, SA

Social Security Number _____

person is awaiting trial in another Federal or State Court (give name of court)

DEFENDANT

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

Issue: **Warrant** Summons

Location Status:

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

Arrest Date _____ or Date Transferred to Federal Custody _____

U.S. Atty Defense

Currently in Federal Custody

Currently in State Custody

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

SHOW DOCKET NO.

18-CR-104-JJM

Writ Required

Currently on bond

Fugitive

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Defense Counsel (if any): _____

FPD CJA RET'D

Appointed on Target Letter

Place of offense RHODE ISLAND County

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHMENT.		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Attachment to
Defendant SECOND SUPERSEDING indictment Relative to a Criminal Action –
In U.S. District Court

Defendant: ISRAEL ARANA RUIZ VELASCO

Count IV: Conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1343.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

Matter Sealed: Juvenile Other than Juvenile
 Pre-Indictment Plea SECOND Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM AARON L. WEISMAN
 U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000
 Name of Asst. U.S. Attorney (if assigned) WILLIAM J. FERLAND

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
U.S. Secret Service-Brandon Henderson, SA

- person is awaiting trial in another Federal or State Court (give name of court)
- this person/proceeding transferred from another district per (circle one) FRCP 20, 21 or 40. Show District
- this is a reprobsecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Atty Defense
- this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.
18-CR-104-JJM

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County

CASE NO. 18-CR-104-JJM
SECOND SUPERSEDING

USA vs.

Defendant: ANGEL L. MORALES

Address: 2411 Federick Douglas Boulevard
Apt. 6H
New York, New York

Interpreter Required Dialect:

Birth Date 5/26/1967 Male Alien (if applicable)
 Female

Social Security Number 122-56-7090

DEFENDANT

Issue: Warrant Summons

Location Status:
 Arrest Date _____ or Date Transferred to Federal Custody _____

- Currently in Federal Custody
- Currently in State Custody
 - Writ Required
- Currently on bond
- Fugitive

Defense Counsel (if any): _____
 FPD CJA RET'D
 Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 5

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHMENT.		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
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Attachment to
Defendant SECOND SUPERSEDING Indictment Relative to a Criminal Action -
In U.S. District Court

Defendant: ANGEL L. MORALES

Count XXV: Conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

Count XXVI, XXVII, and XXXI: Bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

Count XXXIII: Aggravated identity theft, all in violation of 18 U.S.C. § 1028A(a)(1) and (c)(4) and 2.

Penalties: 2 years mandatory imprisonment consecutive to underlying offense.

Attachment to
Defendant Indictment Relative to a Criminal Action –
In U.S. District Court

Defendant: YENESIA PUJOLS

Count IV: Conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1343.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Counts V, VIII and XI: Wire fraud, all in violation of 18 U.S.C. §§ 1343, and 2.

Penalties: 20 years imprisonment, \$250,000 fine and 3 years supervised release.

Count XXV: Conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: INFORMATION INDICTMENT COMPLAINT

CASE NO. _____

Matter Sealed: Juvenile Other than Juvenile

USA vs.

Pre-Indictment Plea Superseding Defendant Added
 Indictment Charges/Counts Added
 Information

Defendant: YAFIRA RODRIGUEZ

Address: 12 Washington Street
 Apartment 311
 New Britain, CT

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM
 U.S. Atty Other U.S. Agency
 Phone No. (401) 709-5000

AARON L. WEISMAN

Name of Asst. U.S. Attorney (if assigned)
 WILLIAM J. FERLAND

Interpreter Required Dialect: _____

Birth Date 5/4/1992 Male Female Alien (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
 U.S. Secret Service-Brandon Henderson, SA

Social Security Number 120-94-4390

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.
 18-CR-104/JJM/PAS

MAG. JUDGE CASE NO.

DEFENDANT

Issue: Warrant Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): _____

FPD CJA RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHMENT.		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
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			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Place of offense RHODE ISLAND County

Attachment to
Defendant Indictment Relative to a Criminal Action -
In U.S. District Court

Defendant: YAFIRA RODRIGUEZ

Count XXV: Conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1344(2).

Penalties: 30 years imprisonment, \$1,000,000 fine and 3 years supervised release.