

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Valle, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”), and have been so employed since November 2019. I am currently assigned to the Document and Benefit Fraud Task Force, where I am responsible for investigating matters including fraud and misuse of visas, permits, and other immigration documents. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18 of the United States Code.

2. This Affidavit is submitted in support of a criminal complaint charging EDUARDO JAVIER IBARRA ARROWSMITH (“IBARRA”) with Fraud and Misuse of Visas, Permits, and Other Documents, in violation of 18 U.S.C. § 1546(a), and Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1). As described below, there is probable cause to believe that IBARRA, a Cuban national and convicted felon, impersonated a deceased doctor (“Doctor 1”) and fraudulently prepared dozens of immigration documents by knowingly using Doctor 1’s name and State of Florida medical license number without lawful authority and indicating compliance with medical examination requirements necessary to exempt naturalization applicants from the English and history and civics testing requirements of the U.S. citizenship naturalization test.

3. The information and statements contained in this Affidavit are based upon my personal knowledge and investigation, as well as documents and information provided to me by other law enforcement personnel and witnesses. Since this Affidavit is being submitted for the

limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation.

PROBABLE CAUSE

The United States Citizenship and Immigration Services, Naturalization, and Form N-648

4. The United States Citizenship and Immigration Services (“USCIS”) is a component of DHS, a department of the Government of the United States. USCIS oversees lawful immigration into the United States and applications to acquire United States citizenship through naturalization.

5. Naturalization is the process by which United States citizenship is conferred upon a foreign citizen or national after he or she fulfills the requirements established by Congress in the Immigration and Nationality Act. Those seeking to become a naturalized United States citizen are required to complete and submit USCIS Form N-400, titled “Application for Naturalization.”

6. Naturalization applicants are required to demonstrate to USCIS, among other characteristics, knowledge of the English language, including the ability to read, write, and speak words in ordinary usage in the English language, as well as knowledge and understanding of United States history and civics.

7. Individuals who, because of physical or mental impairments, are unable to learn or demonstrate the required English language or history and civics knowledge are eligible for a waiver of those requirements. However, USCIS will not grant the waiver unless it receives a signed certification from a licensed medical professional on USCIS Form N-648, Medical Certification for Disability Exceptions, stating that the applicant’s disability or impairment prevents them from demonstrating the required English language or history and civics knowledge.

8. On Form N-648, a licensed medical professional must certify, “under penalty of perjury under the laws of the United States of America, that the information on [the] form and any

evidence submitted with it are all true and correct.” The licensed medical professional must also acknowledge that the “knowing placement of false information on Form N-648 and related documents may also subject [him] to criminal penalties including under 18 U.S.C. section 1546, civil penalties under 8 U.S.C. section 1324c and Immigration and Nationality Act (INA) section 274C, and civil license suspension or revocation by the appropriate authorities.”

9. In determining whether a naturalization applicant is entitled to a waiver of the English language or history and civics tests, USCIS relies upon information provided by the licensed medical professional on Form N-648.

The Defendant and Doctor 1

10. EDUARDO JAVIER IBARRA ARROWSMITH is an alien and citizen and national of Cuba. IBARRA is a convicted felon with the following felony convictions, among others:

- a. Cocaine Possession, on or about August 9, 2001
- b. Passing Forged Instruments, on or about August 9, 2001
- c. Fraud - Impersonation, on or about February 6, 2004
- d. Passing Forged Instruments, on or about February 6, 2004
- e. Drug Possession, on or about February 6, 2004
- f. Vehicle Theft, on or about February 6, 2004
- g. Racketeering Conspiracy, on or about April 9, 2004

11. On or about August 24, 2004, a U.S. Immigration Judge ordered IBARRA removed from the United States.

12. IBARRA holds himself out, on social media and in Miami-Dade County, Florida, as a medical doctor. For example, IBARRA describes himself as a medical doctor on Facebook:



Eduardo Javier Ibarra

Photos

About

Work



medical doctor at **My own medical practice**

September 8, 2020 - Present

Neurólogo

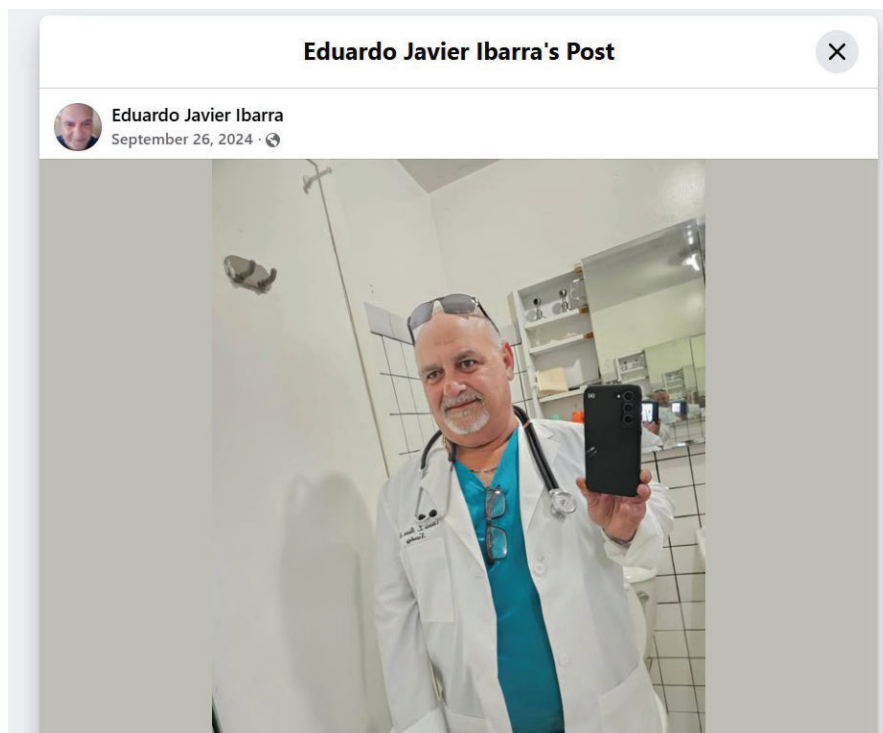


Medical Doctor at **Self-Employed**

1995 - Present · Miami, Florida

Neurologist

Source: <https://www.facebook.com/Edu305Ibarra/> (last accessed June 12, 2026)



Source: <https://www.facebook.com/Edu305Ibarra/posts/pfbid02JUAG7WJTaXV6hrRBufJpHnAKhRE35wmar4yL2Fsf5JXG6Z34iNenoxdUIVGhxARql#> (last accessed June 12, 2026)

13. Despite these representations, IBARRA is not licensed to practice medicine in the State of Florida.

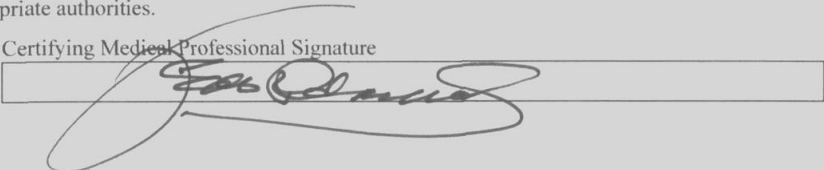
14. Doctor 1 was a neurologist in Miami-Dade County, Florida and a relative of IBARRA. Doctor 1's medical license expired on August 23, 2024. Doctor 1 died in or about May 2025.

Form N-648s Purportedly Certified by Doctor 1

15. In August 2025, a USCIS reviewer began to suspect that someone was fraudulently using Doctor 1's credentials to certify Form N-648s, claiming that naturalization applicants could not meet the English language or history and civics requirements due to disabilities or impairments. The reviewer noted that many of the Forms N-648 attributed to Doctor 1 contained numerous spelling errors as well as incoherent and incomplete diagnoses.

16. Two of the Form N-648s reviewed by USCIS and purportedly certified by Doctor 1 were submitted on behalf of J.B., a lawful permanent resident and naturalization applicant. The first form ("Form 1") was certified on March 17, 2025, nearly six months after Doctor 1's medical license expired. The certification on Form 1 was stamped with Doctor 1's name, practice address, National Provider Identifier ("NPI") number, and State of Florida medical license number.

Additionally, I certify, under penalty of perjury under the laws of the United States of America, that the information on this form and any evidence submitted with it are all true and correct. I am aware that the knowing placement of false information on Form N-648 and related documents may also subject me to criminal penalties including under 18 U.S.C. section 1546, civil penalties under 8 U.S.C. section 1324c and Immigration and Nationality Act (INA) section 274C, and civil license suspension or revocation by the appropriate authorities.

4. Certifying Medical Professional Signature	Date of Signature (mm/dd/yyyy)
	03/17/2025

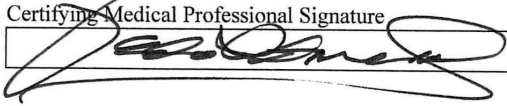
17. Form 1 listed Doctor 1's name, practice address, and State of Florida medical license number. However, it listed IBARRA's cell phone number and personal email address.

18. The clinical diagnosis provided in Form 1 was incoherent and contained numerous misspellings. As a result, USCIS rejected the form as insufficient. Pictured below is the diagnosis contained in Form 1:

Part 3. Information About Disabilities and/or Impairments	
1.	Provide the clinical diagnosis and medical code for all physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities." F33.1 Major depressive disorder (RECURRENT) F41.1 Generalized anxiety disorder. F43.25 Adjustment disorder with mixed disturbances of emotions and conduct. F90.02 Attention deficit Hyperactivity disorder. i am going to try to explain to you the connections that we, the mental health care giver s dont exactly understant, but surely see everyday in patients leveled already with these conditions. I'll talk only about the first two. We all believe these are generic conditions. but , when there is a Major depression and it's almost sister Generalized Anxiety Disorder you can only expect unfortunately to see how a person declines mentaly and medically because these disorder cause both Psychological and real medical problems that are mostly degenerative. it means that they only get worse, because we believe that they are all interconnected somehow, and there is the data now to be able to affirm at least that for the lack of much more strong knowlege than that, but at least you can assure something. Now with that said all I can be certain of , is that this patient it's unable of learning a new language , civics, history, and msny other matters that require short term memory or attentiion/

19. After Form 1 was rejected, a second form ("Form 2"), purportedly certified by Doctor 1, was submitted on behalf of J.B. on July 14, 2025, more than two months after Doctor 1 died. The certification on Form 2 was again stamped with Doctor 1's name, practice address, NPI number, and State of Florida medical license number.

Additionally, I certify, under penalty of perjury under the laws of the United States of America, that the information on this form and any evidence submitted with it are all true and correct. I am aware that the knowing placement of false information on Form N-648 and related documents may also subject me to criminal penalties including under 18 U.S.C. section 1546, civil penalties under 8 U.S.C. section 1324c and Immigration and Nationality Act (INA) section 274C, and civil license suspension or revocation by the appropriate authorities.

4. Certifying Medical Professional Signature  Date of Signature (mm/dd/yyyy)
 07/14/2025

20. Form 2 listed Doctor 1's name, practice address, and State of Florida medical license number. Like Form 1, Form 2 listed IBARRA's cell phone number and personal email address.

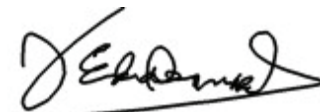
21. Like Form 1, the clinical diagnosis provided in Form 2 was incoherent and contained numerous misspellings. USCIS again rejected Form 2 as insufficient. Pictured below is the diagnosis contained in the Form 2:

Part 3. Information About Disabilities and/or Impairments

1. Provide the clinical diagnosis and medical code for all physical or developmental disabilities and/or mental impairments that affect the applicant's ability to meet the English and/or civics requirements. Also, clearly describe how each disability and/or impairment prevents the applicant from learning English and/or civics. Responses should use common terminology, without abbreviations, that a person without medical training can understand. Refer to page 2 of the Instructions for an example. Please provide the relevant medical code as accepted by the U.S. Department of Health and Human Services (HHS). This includes the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Diseases (ICD). For example, "DSM-V 318.1 Intellectual Disability (Severe)" or "2022 ICD-10-CM F72 Severe intellectual disabilities."
- f34.1 Depressive Personality disorder F41.1 Generalized anxiety disorder. F41.0 Panic disorder (Episodic Paroxysmal Anxiety).f 71 . moderate intellectual dissabilities. This patient came to me after been told by USCIS, that the first certificate I had written for him lacked the nesessary detailed explanation for you to understand how the disorders and mental ilnesses I described could prevent my patient from learning English , and undestanding the civic extucture of our society. then. I will try to explain again why all these mentioned disorder come toguther ,and end up taking away normal analitical processes and cognitive capacity. When a person lives with a Depressive personality disorder, the constant sadness and insecurity that this syndrome produces makes the patient extrmely anxious and fearful, which we end up calling Generalized axiety disorder this automatically will produce in most of this patient Panic attacks which are with time debilitating and people become even more insecure in their lifes . With this all happening even if we try to treat the sytoms , this patient's mind becomes insecureCognitive and IQ levels drop because of diminished capacity to concentrate, and of course learning and memory are also affected , being this the reason we can say they are also Moderately intellectualy dissabled .

22. Based on the deficiencies in the Form N-648s submitted on behalf of J.B., USCIS referred the matter to HSI for investigation. Open-source records identified IBARRA as having a shared address with Doctor 1.

23. A review of State of Florida Driver and Vehicle records for IBARRA showed that his signature was similar to the signature on the Form N-648s.

A handwritten signature in black ink, appearing to read "J. Barrera", written over a horizontal line.

24. On or about November 13, 2025, USCIS interviewed J.B. During the interview, J.B. stated, among other things, that:

- She was looking for a doctor in July or August 2024 and found Doctor 1 on Google and contacted the phone number listed on Google. The phone number she provided belonged to IBARRA.
- She saw Doctor 1 twice, once in late 2024 and once in March or May of 2025, in Miami-Dade County, Florida.
- During these visits, Doctor 1 administered medical tests, examinations, and ordered bloodwork.
- She paid Doctor 1 approximately \$1000 for these visits.

25. During the interview, USCIS showed J.B. a photo of Doctor 1. J.B. did not identify the individual in the photo as Doctor 1. USCIS then showed J.B. a photo of IBARRA. J.B. identified IBARRA as Doctor 1.

26. Thereafter, USCIS referred the matter to HSI for criminal investigation. Collectively, law enforcement reviewed more than 30 Form N-648s purportedly certified by Doctor 1. Like the forms submitted on behalf of J.B., the forms purportedly certified by Doctor 1 contained misspellings, IBARRA's phone number and email, incoherent diagnoses, and a signature resembling IBARRA's. Additionally, law enforcement interviewed several naturalization applicants whose Form N-648s were purportedly certified by Doctor 1. Each applicant interviewed identified IBARRA as Doctor 1. Several applicants stated that IBARRA administered medical examinations, made clinical diagnoses, and prescribed them medication.

27. The investigation to date has revealed that beginning in February 2023 and continuing through at least November 2025, IBARRA, using Doctor 1's NPI number and State of

Florida medical license number, fraudulently certified at least 34 naturalization applicants as disabled or impaired on Form N-648s. As a result of these fraudulent certifications, 14 naturalization applicants were exempted from the civics and English-language tests and thereafter obtained U.S. citizenship.

28. Between February 2023 and November 2025, IBARRA, under penalty of perjury, knowingly made false statements and certified that all of his answers were true and correct on at least 34 Form N-648s. IBARRA made these statements fraudulently using Doctor 1's name and State of Florida medical license number. On each form, IBARRA acknowledged that knowing placement of false statements on Form N-648s and related documents could subject him to criminal penalties. These false statements were material in that they allowed at least 14 naturalization applicants to avoid civics and English-language testing requirements and obtain U.S. citizenship.

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CONCLUSION

29. Based on the foregoing, there is probable cause to believe that on or about July 14, 2025, IBARRA violated 18 U.S.C. § 1546(a) and 18 U.S.C. § 1028A(a)(1) when he falsely and fraudulently certified the Form N-648 submitted on behalf of J.B., using Doctor 1's name and State of Florida medical license number without lawful authority.



MICHAEL VALLE, SPECIAL AGENT
DEPARTMENT OF HOMELAND SECURITY
HOMELAND SECURITY INVESTIGATIONS

Subscribed and Attested to me by Applicant by
Teleconference per Fed. R. Crim. P. 4(d) and 4.1,
this 18 day of June 2026.



HONORABLE LAUREN F. LOUIS
UNITED STATES MAGISTRATE JUDGE