AUSA: Nicholas D. Pavlis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

26 MAG 2402

UNITED STATES OF AMERICA v. VERONICA YARASET MOLINA, Defendant.	**SEALED COMPLAINT** Violations of 18 U.S.C. §§ 641, 1347, 1542, and 1028A COUNTY OF OFFENSE: BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

Mark Balsam, being duly sworn, deposes and says that he is a Special Agent with the Office of the Inspector General, Social Security Administration ("SSA-OIG"), and charges as follows:

COUNT ONE
(Theft of Government Funds)

1. From at least in or about June 2008 through at least in or about April 2026, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, embezzled, stole, purloined, and knowingly converted to her use and the use of another a record, voucher, money, and thing of value of the United States and a department and agency thereof, to wit, the United States Social Security Administration ("SSA"), which exceeded the sum of $1,000, and received, concealed, and retained the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, YARASET MOLINA fraudulently obtained, and attempted to obtain, disability benefits to which she was not entitled, in the amount of approximately $119,345.

(Title 18, United States Code, Section 641.)

COUNT TWO
(Theft of Government Funds)

2. From at least in or about 2010 through at least in or about January 2026, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, embezzled, stole, purloined, and knowingly converted to her use and the use of another a record, voucher, money, and thing of value of the United States and a department and agency thereof, to wit, the United States Department of Health and Human Services ("HHS"), which exceeded the sum of $1,000, and received, concealed, and retained the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, YARASET MOLINA fraudulently obtained Medicare benefits to which she was not entitled, in the amount of approximately $579,583.90.

(Title 18, United States Code, Section 641.)

COUNT THREE
(Theft of Government Funds)

3. From at least in or about April 2008 through at least in or about January 2026, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, embezzled, stole, purloined, and knowingly converted to her use and the use of another a record, voucher, money, and thing of value of the United States and a department and agency thereof, to wit, the United States Department of Agriculture ("USDA"), which exceeded the sum of $1,000, and received, concealed, and retained the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, YARASET MOLINA fraudulently obtained Supplemental Nutrition Assistance Program benefits to which she was not entitled, in the amount of approximately $46,238.28.

(Title 18, United States Code, Section 641.)

COUNT FOUR
(Theft of Government Funds)

4. From at least in or about July 2020 through at least in or about September 2021, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, embezzled, stole, purloined, and knowingly converted to her use and the use of another a record, voucher, money, and thing of value of the United States and a department and agency thereof, to wit, the United States Department of Labor ("USDOL"), which exceeded the sum of $1,000, and received, concealed, and retained the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, YARASET MOLINA fraudulently obtained unemployment benefits to which she was not entitled, in the amount of approximately $31,694.

(Title 18, United States Code, Section 641.)

COUNT FIVE
(Healthcare Fraud)

5. From at least in or about 2010 through at least in or about January 2026, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program, and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, to wit, YARASET MOLINA engaged in a scheme to defraud Medicare by making materially false statements and claims in order to obtain federally-funded healthcare benefits to which she was not entitled.

(Title 18, United States Code, Section 1347.)

COUNT SIX
(Passport Fraud)

6. From at least on or about January 17, 2017, up to and including at least in or about January 2021, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, willfully and knowingly made a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for her own use and the use of another, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, and used and attempted to use, and furnished to another for use a passport the issue of which was secured by reason of a false statement, to wit, YARASET MOLINA submitted a United States passport application with false information about her identity, including a false name, date of birth, and Social Security number, and later used the United States passport she received to travel to and from the United States.

(Title 18, United States Code, Section 1542.)

COUNT SEVEN
(Aggravated Identity Theft)

7. From at least in or about April 2008, up to and including at least in or about January 2026, in the Southern District of New York and elsewhere, VERONICA YARASET MOLINA, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, YARASET MOLINA used, among other identifying information, the name and Social Security number of another individual during and in relation to the theft of government funds, healthcare fraud, and passport fraud offenses charged in Counts One through Six of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1) and 1028A(b).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with SSA-OIG and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement officers and others, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

9. Based on my participation in this investigation and my conversations with other law enforcement officers, I have learned that VERONICA YARASET MOLINA, the defendant, is a citizen and national of the Dominican Republic who entered the United States in approximately 2000 without being formally admitted or paroled by United States immigration authorities. Since unlawfully entering the United States, YARASET MOLINA, who was previously convicted of

drug charges in the Southern District of Florida under the name "Dahlia Morales," engaged in a years-long scheme to obtain at least approximately $776,861.18 in government benefits by fraudulently applying for benefits using, among other stolen identifying information, the name and social security number of another individual, who is described herein as "Victim-1." Additionally, YARASET MOLINA also fraudulently applied for, and subsequently obtained, a United States passport using Victim-1's personal identifying information and proceeded to use that passport to travel to and from the United States on multiple occasions.

Victim-1

10. Based on my personal involvement in this investigation, my conversations with other law enforcement officers, and my examination of various reports and records, I have learned, among other things, the following:

a. Victim-1 is a United States citizen who was born in Rio Piedras, Puerto Rico (the "Victim-1 POB") and assigned a Social Security number (the "Victim-1 SSN"). Victim-1's birth certificate in Puerto Rico reflects a date of birth on a particular date in 1979 (the "Victim-1 DOB").[1] As explained below, VERONICA YARASET MOLINA, the defendant, fraudulently used the Victim-1 SSN and Victim-1 DOB to apply for multiple government benefits while unlawfully present in the United States, and later used this information to fraudulently apply for and receive a United States passport.

b. Victim-1 has never applied for a United States passport or for Social Security disability benefits. Victim-1 has also never resided in New York State.

c. After Hurricane Maria hit Puerto Rico in or about September 2017, Victim-1 applied for emergency relief with the Federal Emergency Management Agency ("FEMA"). That application was denied, at least in part, due to SSA records showing Victim-1 as residing in New York State, which, as explained below, was a result of YARASET MOLINA's fraudulent scheme to use Victim-1's identity to obtain government benefits.

YARASET MOLINA's Fraudulent 2008 Social Security Card Application

11. Based on my review of SSA records and conversations with other law enforcement officers, I have learned the following, in substance and in part:

a. On or about August 4, 2008, the SSA received an application under Victim-1's name for a replacement Social Security card (the "2008 SSC Application"). The application also listed the Victim-1 POB, Victim-1 SSN, and Victim-1 DOB.

b. In support of the 2008 SSC Application, the applicant (who was purportedly Victim-1) included a birth certificate purportedly issued by the Commonwealth of Puerto Rico, which included Victim-1's name, the Victim-1 DOB, and Victim-1 POB.

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[1] I understand that SSA records confirm that Victim-1's correct date of birth is on a particular date in 1980.

c. Records from the SSA show that a Social Security card assigned to the Victim-1 SSN had previously been issued in Puerto Rico on or about June 2, 1980, and on or about July 6, 2005.

d. The form 2008 SSC Application contained the following "Warning": "Deliberately furnishing (or causing to be furnished) false statements on this application is a crime punishable by fine or imprisonment, or both," below which requires a signature from the applicant.

e. The SSA subsequently granted the application and issued the applicant a Social Security card with Victim-1's name and Social Security number (the "Fraudulent Social Security Card").

f. As described further below, I believe VERONICA YARASET MOLINA, the defendant, is the individual who fraudulently submitted the 2008 SSC Application using Victim-1's personal identifying information.

YARASET MOLINA's Fraudulent 2008 Disability Benefits Application

12. Based on my review of SSA documents and records, conversations with other law enforcement officers, and my training and experience, I have learned, among other things, the following, regarding VERONICA YARASET MOLINA's, the defendant's, use of Victim-1's personal information to fraudulently apply for and receive Social Security disability benefits:

a. The SSA, among other things, maintains the Disability Insurance Benefits ("DIB") program under Title II of the Social Security Act, Title 42, United States Code, Section 401 *et seq.*, for eligible individuals. The objective of the DIB program is to replace part of an individual's earnings lost because of physical or mental impairment. Generally, to be eligible for the DIB program, an individual must have met the definition of disability, specifically, that the individual is unable to perform past relevant work and could not perform any other type of work because of a physical or mental impairment which has lasted, or is expected to last, for at least twelve months, or which could be expected to result in death.

b. To apply for disability benefits, an individual must provide, among other things, a Social Security number, age, identity, and proof of United States citizenship or lawful alien status. Individuals who are illegally present in the United States may not receive disability benefits from the SSA.

c. On or about June 10, 2008, an individual purporting to be Victim-1 applied for Social Security disability benefits using Victim-1's name and the Victim-1 SSN (the "2008 DIB Application").

d. In the 2008 DIB Application, the applicant (who, as explained below, I believe to be YARASET MOLINA) represented, among other things, that the Victim-1 SSN was her Social Security number, that she was a United States citizen, and that she resided at a particular address in the Bronx, New York (the "Bronx Address").

e. As stated above, Victim-1 has never resided in the state of New York, nor applied for Social Security disability benefits.

f. The 2008 DIB Application, which was purportedly affirmed to by Victim-1, also included the following affirmation: "I know that anyone who makes or causes to be made a false statement or representation of material fact in an application or for use in determining a right to payment under the Social Security Act commits a crime punishable under federal law by fine, imprisonment, or both. I affirm that all information I have given in connection with this claim is true."

g. In or about August 2008, the SSA granted the 2008 DIB Application, determining that the applicant – purportedly Victim-1 – was eligible to receive Social Security disability payments.

h. From in or about August 2008 up to and including in or about February 2021, the applicant, using Victim-1's personal identifying information, received approximately $119,345 in disability benefits as a result of the 2008 DIB Application. At least some of these benefits were deposited into a bank account ending in 6022 (the "6022 Account") at Financial Institution-1. Based on documents provided by Financial Institution-1, the 6022 Account is listed in Victim-1's name, and has the Bronx Address as the mailing address. Moreover, the email address associated with the 6022 Account is "Vero*****@gmail.com" (the "Vero Email Account").

i. Records separately produced by Google, Inc. show that the recovery email address associated with the Vero Email Account is "yarazet****@icloud.com" (the "Yarazet Email Account"), and that a postal address associated with the Vero Email Account is the Bronx Address. Based on these findings, and my training and experience, I believe that the references to "Vero" (short for Veronica) and "yarazet" (the defendant's middle name) in these email addresses are to YARASET MOLINA.

j. On or about March 25, 2025, the applicant visited an SSA office located at 4941 Broadway, New York, New York 10034 (the "SSA Office"), and attempted to renew the disability benefits that had previously accrued because of the 2008 DIB Application. In support of that request, the applicant presented, among other things, the fraudulent U.S. passport containing Victim-1's personal identifying information, which is described in more detail below. *See infra* ¶ 16.

k. On or about April 24, 2025, the applicant again visited the SSA Office to inquire about reinstating her disability benefits and gave a written statement in Victim-1's name, asking that any record of her employment in Puerto Rico be removed from her SSA profile because the applicant did not work there.

l. On or about April 3, 2026, the applicant visited the SSA Office a third time to inquire about reinstating her disability benefits. At that time, she spoke with an SSA Office supervisor and again represented herself to be Victim-1. The applicant vehemently demanded that her disability benefits be reinstated and cursed at the supervisor.

m. For these reasons and those that follow, I believe that YARASET MOLINA was the applicant who fraudulently submitted the 2008 DIB Application with Victim-1's personal identifying information and received the benefits therefrom.

<u>YARASET MOLINA's Fraudulent 2008 SNAP Application</u>

13. Based on my training and experience as an SSA-OIG Special Agent, I have learned the following about the Supplemental Nutrition Assistance Program ("SNAP"):

a. SNAP issues electronic benefits cards that can be used to purchase food. SNAP is intended for low-income individuals, the disabled, and others in need. To receive SNAP benefits, an individual must apply by providing, among other things, their name, Social Security number, and income information. SNAP is funded by the USDA and administered by the New York State Office of Temporary and Disability Assistance ("OTDA"), local county Departments of Social Services, and the Human Resources Administration ("HRA") in New York City.

b. Individuals who are illegally present in the United States may not receive SNAP benefits.

c. SNAP beneficiaries are provided with a benefit card with a particular card number and access number. When a SNAP beneficiary uses their card to make purchases, the amount of those purchases is recorded by New York State.

14. Based on my conversations with other law enforcement officers, my review of records and documents maintained by the USDA, HRA, and OTDA, and my personal involvement in this investigation, I have learned, among other things, the following regarding VERONICA YARASET MOLINA's, the defendant's, use of Victim-1's personal information to fraudulently apply for and receive SNAP benefits:

a. On or about January 2007, an applicant (believed to be YARASET MOLINA, as explained below) submitted to OTDA a lease agreement for the Bronx Address, which was signed in the name of Victim-1.

b. On or about April 3, 2008, the applicant submitted an application for SNAP benefits in Victim-1's name and included the Victim-1 SSN and the Bronx Address (the "2008 SNAP Application").

c. The 2008 SNAP Application was approved shortly thereafter, and the applicant (purporting to be Victim-1) started receiving SNAP benefits in Victim-1's name using a New York State Benefit Card issued in Victim-1's name (the "Fraudulent NY Benefit Card"). As explained in more detail below, the Fraudulent NY Benefit Card contains a picture of YARASET MOLINA.

d. From at least in or about April 2008 through at least in or about January 2026, the applicant received approximately $46,238.28 in SNAP benefits.

e. The applicant recertified her eligibility to relevant SNAP authorities in Victim-1's name approximately five times between in or about November 2018 and in or about July 2025. Based on documents received from OTDA, the applicant confirmed the Bronx Address as her residence and later provided the Vero Email Account as her email address.

f. For these reasons and those that follow, I believe that YARASET MOLINA was the applicant who fraudulently submitted the 2008 SNAP Application with Victim-1's personal identifying information and received the benefits therefrom.

YARASET MOLINA Fraudulently Obtains Medicare Benefits

15. Based on my involvement in this investigation, my training, and experience, my review of reports and records, and my conversations with other law enforcement officers, including with a Special Agent with the HHS Office of the Inspector General, I have learned, among other things, the following:

a. Medicare is a federally-funded health insurance program for certain individuals, primarily the elderly and disabled. HHS, through the Centers for Medicare and Medicaid Services ("CMS") administers Medicare.

b. Individuals who are illegally present in the United States may not receive Medicare benefits.

c. Medicare is broken into several different parts: Part A, which covers hospital insurance; Part B, which covers medical insurance; Part C, which covers a program known as Medicare Advantage; and Part D, which covers prescription drugs.

d. Medicare Part C provides beneficiaries with the option of receiving Medicare benefits through a private insurance company (a "Plan Sponsor") approved by Medicare, rather than through Part A and/or Part B. Medicare, through CMS, compensates Plan Sponsors on a fixed, monthly basis for each beneficiary, regardless of the services rendered to the beneficiary or the cost of covering the beneficiary's health benefits that month. In order to receive Part C coverage, a beneficiary must first become eligible for, and opt out of, Part A and B coverage. A Medicare-eligible beneficiary may elect Part D coverage.

e. Individuals who apply for and are approved to receive Social Security retirement benefits before they turn 65 years old automatically begin receiving Part A and Part B as of the month that they turn 65 years old. Applications for Part C and Part D are processed through the Plan Sponsor.

f. As a result of the 2008 DIB Application that was fraudulently submitted by VERONICA MARASET MOLINA, the defendant, and its subsequent approval by SSA, YARASET MOLINA, using Victim-1's name, became eligible for health insurance coverage under the Medicare program.

g. Medicare claims data indicates that from at least in or about 2010 until at least in or about January 2026, an individual in Victim-1's name (believed to be YARASET MOLINA, as explained below) received Medicare Part D prescription drug coverage provided by various Plan Sponsors. During that period, approximately 700 claims were submitted for reimbursement for medication prescribed in Victim-1's name in New York State (where Victim-1 does not live). Additionally, during that same period, Medicare claims data shows that an individual in Victim-1's name received Medicare Part C coverage from some of those same Plan Sponsors.

h. In total, between at least in or about 2010 and at least in or about January 2026, approximately $579,583.90 in federal funds have subsidized Medicare Part C and Part D coverage for an individual in Victim-1's name.

i. Medicare claims data indicates that such federal funds paid were the result of claims to Medicare Part C and D Plan Sponsors for services that were rendered in the New York City metropolitan area.

j. Additionally, the vast majority of claims were for reimbursement for medications prescribed by three medical providers, all of whom are affiliated with a medical center located in Manhattan ("Medical Center-1").

k. Records provided by Medical Center-1 included a copy of the Fraudulent NY Benefit Card, which was offered by the patient on whose behalf the claims had been submitted to Medicare Parts C and D in Victim-1's name. As explained in more detail below, the Fraudulent NY Benefit Card contains a picture of YARASET MOLINA.

l. For these reasons and those that follow, I believe that YARASET MOLINA used Victim-1's personal identifying information to fraudulently obtain the Medicare benefits described above.

YARASET MOLINA's Fraudulent 2017 Passport Application

16. Based on my conversations with other law enforcement officers and my examination of various reports and records, I have learned, among other things, the following regarding VERONICA YARASET MOLINA's, the defendant's, use of Victim-1's personal identifying information to fraudulently apply for and obtain a United States passport:

a. On or about January 17, 2017, an applicant submitted a DS-11 form to apply for a United States passport in the name of Victim-1 (the "2017 Passport Application"). On the 2017 Passport Application, the applicant listed the Victim-1 DOB, SSN, and POB as her own. She also listed the Bronx Address as her address, which, as explained above, I believe to be used by YARASET MOLINA.

b. In connection with the 2017 Passport Application, the applicant provided a photo of herself (the "2017 Passport Application Photograph") and several documents as proof of her identity. Those documents included, among others: (i) a copy of a purported birth certificate in Victim-1's name; (ii) a New York State Identification Card in Victim-1's name; (iii) a Medicare card in Victim-1's name; and (iv) a Form SSA-1099 in Victim-1's name that included the Victim-1 SSN and the Bronx Address. The applicant also provided a letter from a landlord, attesting that the applicant had "been a tenant in our building at [the Bronx Address] since 4/1/2007."

c. On or about May 12, 2017, the U.S. Department of State issued the applicant a United States passport under the name of Victim-1 (the "Fraudulent Passport"). Between on or about November 2017 and on or about January 2021, the applicant used the Fraudulent Passport to enter the United States, and return from the Dominican Republic,[2] approximately four times.

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[2] As detailed below, I understand that YARASET MOLINA was born in the Dominican Republic.

d. As explained further below, I believe that YARASET MOLINA was the applicant who fraudulently submitted the 2017 Passport Application using Victim-1's personal identifying information and subsequently used the passport to travel to and from the United States.

YARASET MOLINA Fraudulently Obtains COVID-19 Unemployment Benefits

17. Based on my conversations with other law enforcement officers, my examination of various reports and records, and my personal involvement in this investigation, I know, among other things, the following:

a. Unemployment Insurance ("UI") is a state-federal program that provides monetary benefits to eligible lawful workers. Although state workforce agencies administer their respective UI programs, they must do so in accordance with federal laws and regulations. UI benefits are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Each state sets its own additional requirements for eligibility, benefit amounts, and the length of time benefits can be paid. Generally, UI weekly benefit amounts are based on a percentage of a worker's earnings over a base period. In New York, the New York Department of Labor ("NY DOL") administers the UI program.

b. On March 13, 2020, the President of the United States (the "President") declared the COVID-19 pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207. On March 18, 2020, the President signed into law the Families First Coronavirus Response Act, which provided additional flexibility for state UI agencies and additional administrative funding to respond to the COVID-19 pandemic.

18. Based on my conversations with other law enforcement officers, my examination of various reports and records, and my personal involvement in this investigation, I have learned, among other things, the following regarding VERONICA YARASET MOLINA's, the defendant's, use of Victim-1's personal identifying information to fraudulently obtain unemployment benefits during the COVID-19 pandemic:

a. On or about July 30, 2020, during the COVID-19 pandemic, an applicant (believed to be YARASET MOLINA, as explained below) submitted a fraudulent UI benefits claim in Victim-1's name to USDOL, using the Victim-1 SSN (the "2020 UI Claim"). The 2020 UI Claim was subsequently processed by NY DOL. Among other information, the NY DOL collects the username and email address for claims submitted online. From this information, I know that the 2020 UI Claim listed the Bronx Address and the Vero Email Account. As explained above, I believe the Vero Email Account and the Bronx Address are used by YARASET MOLINA.

b. On or about August 26, 2020, the NY DOL requested identifying documentation to process the 2020 UI Claim. In response, the applicant sent NY DOL, among other things, photocopies of both the Fraudulent Social Security Card and the Fraudulent Passport.

c. From at least in or about July 2020 through at least in or about September 2021, the NY DOL approved, and the applicant received, approximately $31,694 in UI benefits through the 2020 UI Claim.

d. The UI benefits were deposited into a bank account ending in 7882 (the "7882 Account") at Financial Institution-1. Based on documents received from Financial Institution-1, the 7882 Account is listed in Victim-1's name, at the Bronx Address. Additionally, from at least on or about November 30, 2020, through at least on or about September 14, 2021, the 7882 Account received approximately 23 payments from an account in the name of an individual whom I understand to be YARASET MOLINA's sister.[3]

e. For these reasons and those that follow, I believe that YARASET MOLINA used Victim-1's identifying information to submit the fraudulent 2020 UI Claim and obtain government benefits therefrom.

Identification of YARASET MOLINA

19. Based on my conversations with other law enforcement officers, my examination of various reports and records, and my personal involvement in this investigation, I have learned, among other things, the following about the identification of VERONICA YARASET MOLINA, the defendant, as the person who used Victim-1's personal identifying information to fraudulently apply for the government benefits and United States passport described above:

a. Through public searches, law enforcement officers identified a social media profile for the individual listed as an "Emergency Contact" on the 2017 Passport Application (the "Emergency Contact"). Law enforcement personnel then matched an image found on the Emergency Contact's public social media profile with a United States passport application previously submitted in the Emergency Contact's name.

b. Law enforcement officers observed a separate photograph dated on or about May 16, 2014, on the Emergency Contact's social media profile. Under the photograph, the comment section indicated a "Like" from a different profile bearing a profile picture that resembled the photograph submitted with the 2017 Passport Application. The link to that social media profile, which was entitled "Yarazet Perez," included the name "vero.molina.92," which appears to be a variation of YARASET MOLINA's first and last name (the "Molina Profile").

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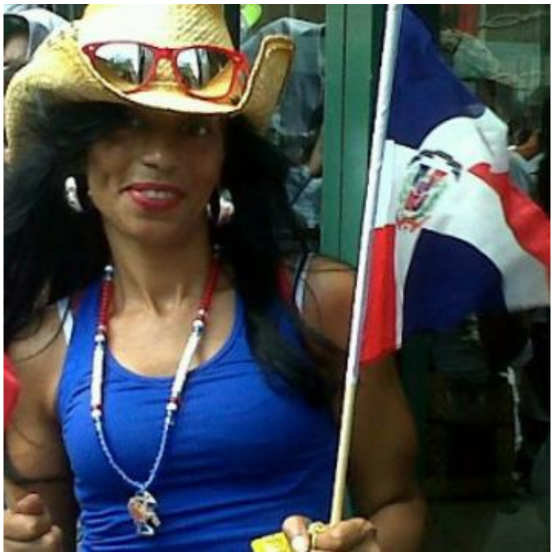
[3] Based on records produced by a different bank ("Financial Institution-2"), an account ending in 3609 was opened in Victim-1's name, using the Bronx Address (the "3609 Account"). Statements for the 3609 Account reflect numerous transfers between the 3609 Account and accounts in the name of (1) an individual who I understand to be YARASET MOLINA's sister, and (2) an individual who I understand to be YARASET MOLINA's adopted brother.

c. Pictures of an individual found on the Molina Profile appear to match those of the applicant that were submitted as part of the fraudulent applications discussed above. For example, below is a comparison of two photographs found on the Molina Profile (on the left and bottom), with a photograph submitted as part of the 2017 Passport Application (and used on the Fraudulent Passport) (on the right):[4]

Molina Profile Example # 1

2017 Passport Application Photo



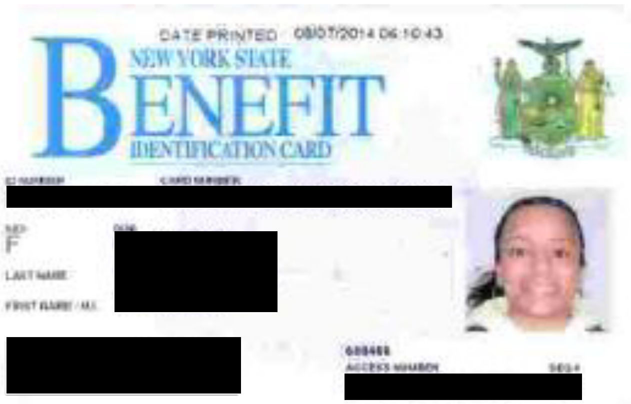
Molina Profile Example # 2

d. Based on my training and experience, I believe the individuals depicted in the photographs above are of the same person. I also understand that the flag shown in the bottom photograph is that of the Dominican Republic – *i.e.*, the country in which YARASET MOLINA was born. *See infra* ¶¶ 20(h)-(i).

[4] Based on my training and experience, I believe the individual depicted in the passport photograph above is the same person who submitted the 2017 Passport Application.

e. Accordingly, I believe the individual pictured above on the Molina Profile is the same individual who submitted the 2017 Passport Application using Victim-1's identifying information, namely, YARASET MOLINA.

f. Additionally, the woman depicted below on the Fraudulent NY Benefit Card, which reflects Victim-1's name, appears to be the same woman depicted in the photographs in Paragraph 20(c) above:



g. Moreover, on or about April 18, 2025, an individual submitted a Form I-130 – also called a "Petition for Alien Relative" – to United States Citizenship and Immigration Services ("USCIS") in Victim-1's name.[5] On the application, the petitioner also listed the Victim-1 DOB as their date of birth, the Victim-1 POB as their place of birth, and the Bronx Address as their "physical address for the last five years." Appended to the I-130 application appear to be photocopies of the Fraudulent Passport and the Fraudulent Social Security Card. The petitioner also attached the below photograph, which appears to be the same woman depicted on the Fraudulent NY Benefit Card, the Fraudulent Passport, and the Molina Profile shown above, *see supra* ¶ 20(c):

Form I-130 Application Photo

[5] Based on my training and experience, I know that a Form I-130 is a petition filed with USCIS by a U.S. citizen or lawful permanent resident to establish a qualifying family relationship with a foreign national, as a first step toward that relative obtaining lawful permanent residence in the United States.

h. An additional post was identified on the Molina Profile, dated on or about August 2, 2010, with a photograph and caption that reads: "“MY SIS DEE MY LUVLY MOTHER AND ME!!!!!!!!!!!!!!!!!!" One of the individuals in that image ("Individual-1") appears to resemble a person in a photograph submitted with a United States passport application on or about October 15, 2016. A review of Individual-1's Naturalization (N-400) form from February 15, 2016, lists her country of birth and country of citizenship as Dominican Republic. In Part 10 of the N-400 form – titled "Information About Your Children" – Individual-1 listed "Veronica Molina," with a birth date on September 11 (the "Molina DOB") and country of birth as the Dominican Republic.[6] Individual-1 also listed "Veronica Molina" and the sister referenced in Paragraph 18(d) above as her "biological child[ren]."[7]

i. Law enforcement located a birth certificate for YARASET MOLINA in the Dominican Republic under the name of "Veronica Yaraset," which lists Individual-1 as her mother, an individual with the surname "Molina" as her father, and the Molina DOB. Moreover, law enforcement identified a birth registry form from the Dominican Republic in the name of "Veronica Yaraset," with the Molina DOB.

Fingerprint Comparison

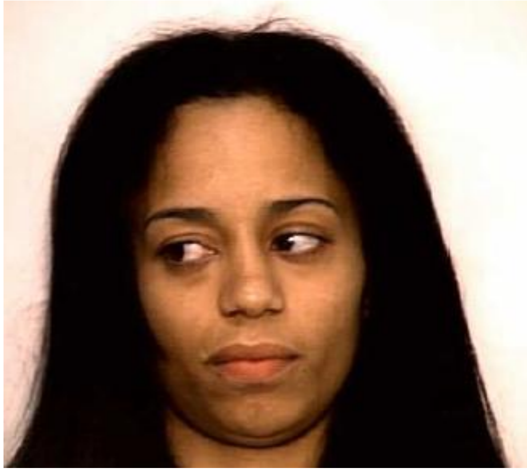
j. On or about June 7, 2025, an individual who I believe to be YARASET MOLINA submitted an application in Victim-1's name – using the Victim-1 DOB and SSN, as well as the Bronx Address – to become a home health aide in New York State. As part of the application process, the New York State Department of Health took the applicant's fingerprints (the "2025 Fingerprints").

k. Based on my review of a fingerprint comparison report done by the Diplomatic Security Service of the U.S. Department of State, the 2025 Fingerprints match fingerprints taken of a defendant named "Dahlia Morales" as part of Morales's federal arrest processing on or about October 18, 2000, in the narcotics case captioned *United States v. Dahlia Morales*, 00 Cr. 921 (PCH) (S.D. Fla. 2000). Based on my review of the pre-sentence investigation report by the U.S. Probation Office ("Probation") in that case, Morales's aliases include "Veronica Morales" and "Dahlia Molina." Additionally, Morales told Probation that she refers to Individual-1 as her mother – *i.e.*, the same person who listed YARASET MOLINA as her daughter in her February 15, 2016 N-400 Form, *see supra* ¶ 20(h). Probation chronology records from the *Morales* case further show that, after her conviction and later release from her prison sentence, Morales reported her residence as the same apartment in the Bronx, New York that Individual-1 listed in her February 15, 2016 N-400 Form.

[6] A separate social media post from the Molina Profile, dated September 11, 2010, and corroborates YARASET MOLINA's date of birth, reads as follows: "happy birthday 2 meeeeeeeeeeeeeeeeeeeeeeee!!!!!!!!!"

[7] Individual-1 also listed the adopted brother referenced in Paragraph 19(b) above as her "legally adopted child."

l. Below is a photograph that the U.S. Marshals Service ("USMS") took of the defendant "Dahlia Morales" in connection with the *Morales* case, which appears to depict the same individual as the photographs of YARASET MOLINA shown above:



USMS Photo of "Dahlia Morales"

m. Accordingly, I believe that YARASET MOLINA is the individual who was convicted under the name "Dahlia Morales," and who falsely claimed to be Victim-1 in connection with the 2008 SSC Application, 2008 DIB Application, 2008 SNAP Application, 2017 Passport Application, 2020 UI Claim, and the Medicare claims described above, and as a result fraudulently obtained approximately $776,861.18 in government funds, as well as a U.S. passport.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of VERONICA YARASET MOLINA, the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

/s Mark Balsam (By Court with Authorization)
____
Mark Balsam
Special Agent
Office of Inspector General
Social Security Administration

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 17th day of June, 2026.

Sarah Cave
____
THE HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK