

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR FRAUD AND RELATED  
ACTIVITY IN CONNECTION WITH IDENTIFICATION  
DOCUMENTS, AUTHENTICATION FEATURES, AND INFORMATION

**FELONY**

UNITED STATES OF AMERICA

\* CRIMINAL DOCKET NO.

v.

\* SECTION:

FRANCISCO ANTONIO ZUNEN-MORALES

\* VIOLATION: 18 U.S.C. § 1028(a)(2)  
18 U.S.C. § 1546(a)

a/k/a Juan

BENY CORTEZ-PEREZ

\*

a/k/a Jorge

\*

\* \* \*

The Grand Jury charges that:

COUNT 1

On or about January 17, 2008, in the Eastern District of Louisiana, the defendant, **FRANCISCO ANTONIO ZUNEN-MORALES, a/k/a Juan**, did knowingly transfer a false identification document which appeared to have been issued by or under the authority of the United States, to wit: a false Social Security identification card, knowing that such document and feature was stolen and produced without lawful authority, and that the false identification document was and

appears to have been issued under the authority of the United States; all in violation of Title 18, United States Code, Section 1028(a)(2).

**COUNT 2**

On or about January 17, 2008, in the Eastern District of Louisiana, the defendant, **FRANCISCO ANTONIO ZUNEN-MORALES, a/k/a Juan**, did knowingly utter an alien registration receipt card in the name Samuel Soto, which the defendant knew to be forged, counterfeited, altered, and falsely made; all in violation of Title 18, United States Code, Section 1546(a).

**COUNT 3**

On or about February 1, 2008, in the Eastern District of Louisiana, the defendant, **FRANCISCO ANTONIO ZUNEN-MORALES, a/k/a Juan**, did knowingly transfer false identification documents which appeared to have been issued by and under the authority of the United States, to wit: four (4) fraudulent Social Security cards, knowing that such documents and features were stolen and produced without lawful authority, and that the false identification documents were and appear to have been issued under the authority of the United States; all in violation of Title 18, United States Code, Section 1028(a)(2).

**COUNT 4**

On or about February 1, 2008, in the Eastern District of Louisiana, the defendant, **FRANCISCO ANTONIO ZUNEN-MORALES, a/k/a Juan**, did knowingly utter four (4) alien registration receipt cards in the names Hector Ramos, Walter Castillo, Javier Esquivell Bernitez and

Guillermo Maciel, which the defendant knew to be forged, counterfeited, altered, and falsely made; all in violation of Title 18, United States Code, Section 1546(a).

**COUNT 5**

On or about April 3, 2008, in the Eastern District of Louisiana, the defendant, **BENY CORTEZ-PEREZ, a/k/a Jorge**, did knowingly transfer false identification documents which appeared to have been issued by and under the authority of the United States, to wit: five (5) fraudulent Social Security cards, knowing that such documents and features were stolen and produced without lawful authority, and that the false identification documents were and appear to have been issued under the authority of the United States; all in violation of Title 18, United States Code, Section 1028(a)(2).

**COUNT 6**

On or about April 3, 2008, in the Eastern District of Louisiana, the defendant, **BENY CORTEZ-PEREZ, a/k/a Jorge**, did knowingly utter four (4) alien registration receipt cards in the names Javier Esquivell Bernitez, Walter Castillo, Jose Padilla, Juan Delgado-Guzman and Carlos Hernandez-Soto which the defendant knew to be forged, counterfeited, altered, and falsely made; all in violation of Title 18, United States Code, Section 1546(a).

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1 through 6 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1028, 1546 and 982(a).

2. As a result of the offenses, alleged in Counts 1 through 6, the defendants, **FRANCISCO ANTONIO ZUNEN-MORALES, a/k/a Juan** and **BENY CORTEZ-PEREZ, a/k/a Jorge**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 982(a)(6)(A), all property real or personal, constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of identity and related fraud, in violation of Title 18, United States Code, Sections 1028 and 1546.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) and


Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

**A TRUE BILL:**


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FOREPERSON




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JIM LETTEN  
United States Attorney  
Louisiana Bar Roll Number 8517



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JAN MASELLI MANN  
First Assistant U.S. Attorney  
Louisiana Bar Roll Number 9020



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ANDRE' JONES  
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New Orleans, Louisiana  
June 13, 2008