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U.S. DISTRICT COURT
LOS ANGELES
CALIFORNIA

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSICA GODOY RAMOS,

Defendant.

CR No. 17 CR 00671 - DMG
I N F O R M A T I O N
[18 U.S.C. § 1341: Mail Fraud;
18 U.S.C. § 1028A: Aggravated
Identity Theft]

The Acting United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1341]

Beginning in or before 2014, and continuing through at least February 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant JESSICA GODOY RAMOS ("defendant") knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud victims as to material matters, and to obtain money and property from them by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

1 The fraudulent scheme was carried out, in substance, in the
2 following manner and by the following means, among others:
3 Defendant, who failed to complete law school and pass the bar
4 exam, found a practicing attorney in New York with a similar
5 name, and impersonated her. Posing as the genuine attorney,
6 defendant solicited attorney's fees from victims who needed help
7 with immigration matters. With some victims, defendant simply
8 took their money and performed no services. With other victims,
9 defendant submitted immigration petitions on their behalf as
10 though she were an attorney. Defendant also counterfeited
11 immigration parole documents and gave them to her clients to
12 make it appear that she had succeeded on their behalf.

13 On or about May 25, 2016, within the Central District of
14 California, defendant, for the purpose of executing and
15 attempting to execute the above-described scheme to defraud,
16 caused to be placed in an authorized depository for mail matter
17 to be sent and delivered by the United States Postal Service,
18 according to the directions thereon, a Form I-485, Application
19 to Register Permanent Residence or Adjust Status and a Form I-
20 130, Petition for Alien Relative.

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COUNT TWO

[18 U.S.C. § 1028A]

Beginning in or before 2014, and continuing through at least February 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant JESSICA GODOY RAMOS knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1341, Mail Fraud, as charged in Count One.

SANDRA R. BROWN
Acting United States Attorney



LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

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Chief, Major Frauds Section

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