

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

vs.

VERONICA PERDOMO
LATOYA SANDERS

) CR. NO. 16 18CR673
) 18 U.S.C. § 1343
) 18 U.S.C. § 912
) 18 U.S.C. § 1017
) 18 U.S.C. § 2
) 18 U.S.C. § 981(a)(1)(C)
) 28 U.S.C. § 2461(c)
)

SEALED INDICTMENT

COUNTS 1 - 2

THE GRAND JURY CHARGES:

1. That from in or about January 2016 to on or about the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, VERONICA PERDOMO and LATOYA SANDERS, hereafter referred to individually as PERDOMO or SANDERS or together as the Defendants, devised and intended to devise a scheme and artifice to defraud and to obtain monies by means of false and fraudulent pretenses, representations and promises and, during such period stated above, did execute and attempt to execute such scheme and artifice and, in so doing, did transmit and cause to be transmitted in interstate and foreign commerce, by means of wire communications, certain electronic sounds, signals and writings, such scheme and artifice and wire communications being more fully and specifically set forth below.

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THE SCHEME AND ARTIFICE

2. PERDOMO and SANDERS devised a scheme whereby they falsely pretended to have positions of authority or expertise that for a fee they could use to assist immigrants in obtaining or updating their status in the United States.

3. At various times PERDOMO and SANDERS pretended to be employees of the Department of Homeland Security, U.S. Citizenship and Immigration Services, hereafter referred to as DHS/CIS.

4. Additionally, PERDOMO would at times pretend to be an attorney or paralegal employed by a private law firm located in Greer, South Carolina.

5. Additionally, PERDOMO would at times pretend to be a Notary Public.

6. In order to bolster her false statements set forth above, PERDOMO would show people the following:

a. Business cards of the law firm in Greer of which she falsely claimed to be a part;

b. A photograph of herself in a courtroom that she claimed was federal immigration court which was in fact simply a State municipal courtroom; and

c. Various letters to herself in which she falsely claimed to be from the DHS/CIS.

7. PERDOMO would falsely advise immigrants that based on her position of authority or expertise, that she could assist them in obtaining legal status in the

United States if they had no such status or that if they has some sort of legal status in the United States that she could assist them in upgrading that status. For these services, PERDOMO obtained fees from the victims of her scheme.

8. In addition to claiming that she could assist persons already in the United States, PERDOMO would falsely tell people that she could arrange for persons in other countries to enter the United States even though such persons had no legal right to do so. She would further advise that once such persons entered the United States she could then cause them to gain legal status. As with persons already here to whom PERDOMO sold her “services,” she would demand and receive fees for her “services” for persons outside the United States.

9. In addition to cash payments, PERDOMO accepted check and money orders payable to “Homeland Security” or “Immigration Services” in exchange for the work that she falsely claimed to be doing for the aliens. On occasion SANDERS would accept the payments and turn same over to PERDOMO. PERDOMO would then forge endorsements on the checks and money orders and cash them.

10. In order to convince the victims that she was working on their behalf and that governmental action was being taken, PERDOMO would counterfeit letters purporting to be from the Department of Homeland Security and provide them to the victims.

11. During the course of executing their scheme and artifice to defraud PERDOMO and SANDERS fraudulently obtained approximately \$59,667.00 from their victims.

THE WIRE COMMUNICATIONS

12. On or about the dates enumerated below as to each Count, in the District of South Carolina and elsewhere, having devised and intended to devise a scheme and artifice to defraud and to obtain monies by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the above-described scheme and artifice, the Defendants, VERONICA PERDOMO and LATOYA SANDERS, did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain sounds, signals and writings, either sent from or received within the District of South Carolina:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE COMMUNICATION</u>
1	April 2016	Telephone call between Georgia and South Carolina
2	July 2014	Telephone call between the country of Mexico and South Carolina

All in violation of Title 18, United States Code, Section 1343.

COUNTS 3 - 6

THE GRAND JURY FURTHER CHARGES:

That on or about the dates specified below, in the District of South Carolina and elsewhere, the Defendants, VERONICA PERDOMO and LATOYA SANDERS, did, and did aid and abet each other in so doing, falsely assume and pretend to be

officers and employees of the United States acting under the authority thereof, that is, they claimed that they were employees of the Department of Homeland Security, Citizenship and Immigration Services, and in such falsely assumed and pretended character did falsely obtain a thing of value, to wit money, in the amounts specified below from persons whose identities are known to the Grand Jury but are herein identified by their initials only:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>	<u>VICTIM(S)</u>
3	January 2016 – January 2017	\$12,150.00	JLMC
4	February 2016 – January 2017	\$8,000.00	JC and MS
5	January 2016 – June 2016	\$3,160.00	JC and AC
6	February 2016 – June 2016	\$2,930.00	NN

All in violation of Title 18, United States Code, Sections 912 and 2.

COUNTS 7 - 18

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, in the District of South Carolina, the Defendant, VERONICA PERDOMO, did fraudulently and wrongfully affix or impress the seal of any department or agency of the United States, to or upon any certificate, instrument, commission, document or paper, to wit, she did place the seal of the Department of Homeland Security, U.S. Citizenship and Immigration Services on 12 paper communications or letters, each of which is more fully identified below by the addressee, whose identity is known to the Grand Jury but is herein identified

only by his or her initials, and each of which communications purported to be from the Immigration and Naturalization Service California Service Center located in Laguna Niguel, California:

<u>COUNT</u>	<u>DATE</u>	<u>ADDRESSEE</u>
7	March 1, 2016	JLMC
8	April 6, 2016	JLM
9	March 1, 2016	MMHS
10	April 6, 2016	MM
11	August 11, 2016	WOL
12	June 6, 2016	MFL
13	February 29, 2016	ACL
14	March 5, 2016	USE
15	March 5, 2016	CSS
16	July 29, 2016	GMS
17	July 29, 2016	LVS
18	April 12, 2016	PDV

All in violation of Title 18, United States Code, Section 1017.

FORFEITURE

WIRE FRAUD:

Upon conviction to violate Title 18, United States Code, Section 1343 as charged in Counts 1 and 2 of the Indictment, the Defendants, **VERONICA PERDOMO** and **LATOYA SANDERS**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such property.

PROPERTY:

The property subject to forfeiture includes, but is not limited to, the following:

Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in the Indictment, that is, a minimum of approximately \$59,667.00 in United States currency, and all interest and proceeds traceable to their violation of 18 U.S.C. § 1343.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant(s)-

- 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 intention of the United States, pursuant to Title 18, United States Code, Section

982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property;

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A true Bill

~~REDACTED
FOREPERSON~~



SHERRI A. LYDON (DCS/kk)
UNITED STATES ATTORNEY