

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHWESTERN DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No.:
	)	
ANGELICA MARIA FRANCISCO	)	

INFORMATION

The United States Attorney charges that:

INTRODUCTION

At all times material to this Information:

1. Defendant **ANGELICA MARIA FRANCISCO** was a Guatemalan national who resided in Russellville, Alabama, despite not having any legal immigration status in the United States.
2. In or around 2011, **FRANCISCO** willfully and knowingly assumed the identity of P.J., a female United States citizen.
3. Using P.J.'s name, date of birth, and social security number, as well as P.J.'s birth certificate, social security card, and Guatemalan driver's license, **FRANCISCO** submitted a Form DS-11 application for a United States passport on July 12, 2011. Notably, the passport application included a photograph of **FRANCISCO**, not P.J.

4. **FRANCISCO** represented in the passport application that she was P.J. even though she knew that it was untrue in order to procure a United States passport and, on September 8, 2011, **FRANCISCO** was, in fact, issued a United States passport (Passport No. 490786268) in P.J.'s name.

5. **FRANCISCO** subsequently used this 2011 passport to travel to and from Guatemala in 2012, 2015, and 2018.

6. Likewise, using the identity of P.J., **FRANCISCO** registered to vote in the State of Alabama on February 10, 2016.

7. Thereafter, **FRANCISCO** voted in the State of Alabama's 2016 primary election on March 1, 2016; 2016 general election on November 8, 2016; 2020 primary runoff election on August 20, 2020; and 2020 general election on November 3, 2020.

8. Finally, using the expired 2011 United States passport (Passport No. 490786268) issued in P.J.'s name (which not only contained P.J.'s name, but also P.J.'s date of birth), **FRANCISCO** submitted a Form DS-82 passport renewal application on September 6, 2021. Notably, the passport renewal application included a photograph of **FRANCISCO**, not P.J.

9. **FRANCISCO** represented in the passport renewal application that she was P.J. even though she knew that it was untrue in order to procure a United States

passport and, on September 16, 2021, **FRANCISCO** was, in fact, issued a renewed United States passport (Passport No. A00475490) in P.J.'s name.

10. **FRANCISCO** subsequently used this 2021 passport to travel to and from Guatemala in 2022.

COUNT ONE

False Statements in Application for a United States Passport
[18 U.S.C. § 1542]

11. Paragraphs 1 through 4 and Paragraphs 8 through 9 of this Information are realleged and incorporated as though fully set forth herein.

12. On or about the date listed below, in Franklin County, in the Northern District of Alabama, the Defendant,

ANGELICA MARIA FRANCISCO,

willfully and knowingly made false statements in an application for a United States passport, with the intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, in that in such application she knowingly provided a false name and date of birth, as well as knowingly submitted false identification documents in support of such application.

Count	Date	False Statements & Identification Documents
1	September 6, 2021	The Defendant represented on a September 6, 2021 DS82 passport renewal application that her name was P.J. and her date of birth was November 14, 1988, even though her true

		name is Angelica Maria Francisco and her true date of birth is January 29, 1982. Additionally, in support of the same passport application, the Defendant submitted false identification documents, namely the expired 2011 United States passport (Passport No. 490786268) issued in P.J.'s name.
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All in violation of Title 18, United States Code, Section 1542.

COUNT TWO

Aggravated Identity Theft

[18 U.S.C. § 1028A]

13. Paragraphs 1 through 4 and Paragraphs 8 through 9 of this Information are realleged and incorporated as though fully set forth herein.

14. On or about the date listed below, in Franklin County, in the Northern District of Alabama, the Defendant,

ANGELICA MARIA FRANCISCO,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another for the count listed below, knowing that the means of identification belonged to another actual person, during and in relation to a felony encompassed by Title 18, United States Code, Section 1028A(c)(7), to wit, False Statements in an Application for a United States Passport in violation of Title 18, United States Code, Section 1542:

Count	Date	Means of Identification
2	September 6, 2021	The Defendant used numerous means of identification belonging to P.J., including her

		name and date of birth (November 14, 1988), to apply for a renewed passport on September 6, 2021.
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All in violation of Title 18, United States Code, Section 1028A.

COUNTS THREE THROUH SEVEN

Use of a United States Passport Obtained By False Statement

[18 U.S.C. § 1542]

15. Paragraphs 1 through 5 and Paragraphs 8 through 10 of this Information are realleged and incorporated as though fully set forth herein.

16. On or about the dates listed below for each count, in the Northern District of Alabama and elsewhere, the Defendant,

ANGELICA MARIA FRANCISCO,

did knowingly use United States passports that were secured by reason of false statements made in the applications for such passports – specifically, the means of identification and identification documents of another person, *i.e.*, the name, date/location of birth, social security number, birth certificate, social security card, and Guatemalan driver's license of P.J. – to gain entry to the United States.

Count	Date	Use of United Staes Passport Obtained By False Statement
3	August 6, 2015	Using a United States passport (Passport No. 490786268) that she obtained by using the means of identification and identification documents of a U.S.

		citizen (<i>i.e.</i> , P.J.), Defendant traveled from Guatemala to the United States, where her port of debarkation was Birmingham, Alabama.
4	May 31, 2018	Using a United States passport (Passport No. 490786268) that she obtained by using the means of identification and identification documents of a U.S. citizen (<i>i.e.</i> , P.J.), Defendant traveled to Guatemala from the United States, where her port of embarkation was Huntsville, Alabama.
5	June 7, 2018	Using a United States passport (Passport No. 490786268) that she obtained by using the means of identification and identification documents of a U.S. citizen (<i>i.e.</i> , P.J.), Defendant traveled from Guatemala to the United States, where her port of debarkation was Birmingham, Alabama.
6	October 22, 2022	Using a United States passport (Passport No. A00475490) that she obtained by using the means of identification and identification documents of a U.S. citizen (<i>i.e.</i> , P.J.),

		Defendant traveled to Guatemala from the United States, where her port of embarkation was Birmingham, Alabama.
7	November 8, 2022	Using a United States passport (Passport No. A00475490) that she obtained by using the means of identification and identification documents of a U.S. citizen (<i>i.e.</i> , P.J.), Defendant traveled from Guatemala to the United States, where her port of debarkation was Birmingham, Alabama

All in violation of 18, United States Code, Section 1542.

COUNTS EIGHT & NINE

False Claim of Citizenship in Connection with Voting
[18 U.S.C. § 1015(f)]

17. Paragraphs 1 through 2 and Paragraphs 6 through 7 of this Information are realleged and incorporated as though fully set forth herein.

18. On or about the dates listed below for each count, in Franklin County, in the Northern District of Alabama, the Defendant,

ANGELICA MARIA FRANCISCO,

knowingly made a false claim that she was a citizen of the United States in order to register to vote or vote in Federal, State, or local elections.

Count	Date	False Claim of Citizenship in Connection with Voting
8	August 20, 2020	Defendant voted in the State of Alabama's 2020 primary runoff election using the assumed identity of P.J., a U.S. citizen.
9	November 3, 2020	Defendant voted in the State of Alabama's 2020 general election using the assumed identity of P.J., a U.S. citizen.

All in violation of Title 18, United States Code, Section 1015(f).

NOTICE OF FORFEITURE

1. The allegations of Count One and Counts Three through Seven of this Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Section 982(a)(6).

2. Pursuant to Rule 32.2(a) of the *Federal Rules of Criminal Procedure*, the Defendant,

ANGELICA MARIA FRANCISCO,

is hereby notified that, upon conviction of the offenses alleged in Count One and Counts Three through Seven of this Information, the Defendant shall forfeit to the United States, under Title 18, United States Code, Section 982(a)(6):

- a. any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and
- b. any property, real or personal:
 - (i) that constitutes, is derived from, or is traceable to the proceeds obtained directly or indirectly from the commission of the offense, or
 - (ii) that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

3. If any of the property described above as being forfeitable under Title 18, United States Code, Section 982(a)(6), as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty;

it is the intention of the United States, under Title 18, United States Code, Section 982(b), 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 property described above.

All pursuant to Title 18, United States Code, Section 982(a)(6).

PRIM F. ESCALONA
United States Attorney

/s/ *electronic signature*
BRETT A. JANICH
Assistant United States Attorney