

APR -7 2015

U.S. DISTRICT COURT
W. DIST. OF N.C.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

UNITED STATES OF AMERICA) DOCKET NO. 1: 15 CR 22
)
)
) **BILL OF INDICTMENT**
)
VS.)
)
) Violations:
) 18 U.S.C. § 1542
) 18 U.S.C. § 1028A
1) JOSE SALVADOR LANTIGUA,)
2) DAPHNE SYLVIA SIMPSON,) 18 U.S.C. § 1001
)
Defendants.)
_____)

THE GRAND JURY CHARGES:

COUNT ONE

On or about the 18th day of November, 2014, in Buncombe County, within
the Western District of North Carolina, the defendant

JOSE SALVADOR LANTIGUA

did willfully and knowingly make a false statement in an application for a passport
with the intent to induce and secure the issuance of a passport under the authority
of the United States for his own use and contrary to the laws regulating the
issuance of passports and the rules prescribed pursuant to such laws, in that in such
application he stated that his name was "Ernest Allen Wills," which statement he
knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT TWO

On or about the 18th day of November, 2014, in Buncombe County, within the Western District of North Carolina, the defendant

JOSE SALVADOR LANTIGUA

did knowingly transfer, possess and use, 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 1542 (false statement in the application and use of a passport), and to a felony violation of Title 18, United States Code, Sections 1341 and 1343 (mail and wire fraud), knowing that the means of identification belonged to another person, in violation of Title 18, United States Code, Section 1028A.

COUNT THREE

On or about the 21st day of March, 2015, in Transylvania County, within the Western District of North Carolina, the defendant

DAPHNE SYLVIA SIMPSON

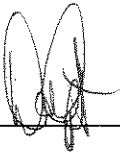
did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the United States, in that during a criminal investigation into violations

of Title 18, United State Code, Sections 1542 and 1028A, she told a Special Agent from the Department of State that the man who was with her at the time was "Ernest Wills," and that he was her "friend," when in fact, and as she then and there knew, his name was JOSE SALVADOR LANTIGUA, and that he was her husband, in violation of Title 18, United States Code, Section 1001.

A TRUE BILL

GRAND JURY FOREMAN

JILL WESTMORELAND ROSE
ACTING UNITED STATES ATTORNEY



DON GAST
ASSISTANT UNITED STATES ATTORNEY