

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

ELIESER AURELIO GOMEZ-ZALAYA

CASE NO. **8:23cr296KKM-AAS**

18 U.S.C. § 1028A(a)(1)
(Aggravated Identity
Theft)

42 U.S.C. § 408(a)(7)(B)
(False Representation of a
Social Security Number)

18 U.S.C. § 1015(e)
(False Claim of U.S.
Citizenship)

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FILED USDC - FLND - TPA

INDICTMENT

The Grand Jury charges:

**COUNT ONE
(Aggravated Identity Theft)**

On or about June 14, 2021, in the Middle District of Florida, the defendant,

ELIESER AURELIO GOMEZ-ZALAYA,

did knowingly possess and use, without lawful authority, a means of identification of another person, specifically, the name of G.B.S., and the Social Security number of G.B.S., during and in relation to a felony violation of 42 U.S.C. § 408(a)(7)(B), false representation of a Social Security account number, as charged in Count Two of this Indictment, Count Two being incorporated by reference, and to a felony violation of

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18 U.S.C. § 1015(e), false claim of United States citizenship with the intent to engage unlawfully in employment in the United States, as charged in Count Three of this Indictment, Count Three being incorporated by reference, and knowing that such means of identification belonged to another actual person.

In violation of 18 U.S.C. § 1028A(a)(1).

COUNT TWO
(False Representation of a Social Security Number)

On or about June 14, 2021, in the Middle District of Florida, the defendant,

ELIESER AURELIO GOMEZ-ZALAYA,

for the purpose of obtaining anything of value from any person, and for any other purpose, did knowingly, with the intent to deceive, falsely represent to COMPANY a number to be the Social Security account number assigned by the Commissioner of Social Security to him, when in fact such number was not the Social Security account number assigned by the Commissioner of Social Security to him.

In violation of 42 U.S.C. § 408(a)(7)(B).

COUNT THREE
(False Claim of United States Citizenship)

On or about June 14, 2021, in the Middle District of Florida, the defendant,

ELIESER AURELIO GOMEZ-ZALAYA,

did falsely and knowingly claim to be a citizen of the United States with the intent to engage unlawfully in employment in the United States.

In violation of 18 U.S.C. § 1015(e).

FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of 18 U.S.C. § 982(a)(6).

2. From his engagement in any or all of the violations alleged in Count One, the defendant,

ALLAN OSEAS GOMEZ-ZALAYA,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(6), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and property real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and any property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

3. If any of the forfeitable assets described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon 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 this Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

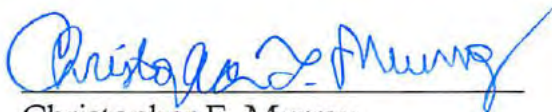
the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

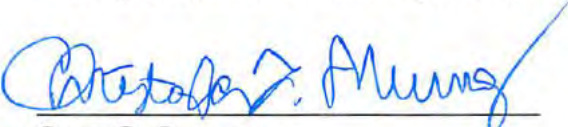
A TRUE BILL,



Foreperson

ROGER B. HANDBERG
United States Attorney

By: 
Christopher F. Murray
Assistant United States Attorney
Chief, Criminal Division (South)

By: 
Sara C. Sweeney
First Assistant United States Attorney

August 23

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

ELIESER AURELIO GOMEZ-ZALAYA

INDICTMENT

Violations: 18 U.S.C. § 1028A(a)(1), 42 U.S.C. § 408(a)(7)(B), 18 U.S.C. § 1015(e)

A true bill,



Foreperson

Filed in open court this 6th day

of September 2023.


Clerk

Bail \$ _____
