

FILED

MAR 19 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMAHeidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. 25 CR - 99 - SEH

Plaintiff,

v.

KARINA GARCIA-SALAZAR

a/k/a "Karla,"

a/k/a "Chuekas,"

a/k/a "Angeles Santos,"

a/k/a "Angeles Santos Luz,"

a/k/a "Reyna Martha Salazar
Uribe,"JORGE AUGUSTO PRIETO-
GAMBOA,

a/k/a "Augusto Prieto Regueira,"

Defendants.

INDICTMENT[COUNT ONE: 18 U.S.C. §§ 1028(f)
and 1028(a)(2) – Conspiracy to

Transfer Identification Documents;

COUNT TWO: 18 U.S.C. §§ 1028(f)

and 1028(a)(3) – Conspiracy to

Possess Five or More Documents

With Intent to Transfer;

COUNT THREE: 18 U.S.C. § 1028A

– Aggravated Identity Theft;

Forfeiture Allegation: 18 U.S.C.

§§ 982(a) and 1028(b) – Identity Theft
Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 1028(f) and 1028(a)(2)]

The Conspiracy and its Object

1. From on or about August 12, 2020, to the date of this Indictment, in the Northern District of Oklahoma, the defendants **KARINA GARCIA SALAZAR** ("**GARCIA**"), a/k/a "Karla," a/k/a "Chuekas," a/k/a "Angeles Santos," a/k/a "Angeles Santos Luz," a/k/a "Reyna Martha Salazar Uribe," and **JORGE AUGUSTO PRIETO-GAMBOA** ("**PRIETO**"), a/k/a "Augusto Prieto Regueira," knowingly conspired, confederated, and agreed with each other and others, known and unknown to the Grand Jury, to commit a fraud crime listed in United States

Code, Title 18, Chapter 47, namely: knowingly Transferring False Identification Documents in violation of Title 18, United States Code, Section 1028(a)(2); in the following manner:

The Purpose of the Conspiracy

2. The purpose of the conspiracy was to enrich **GARCIA** and **PRIETO** by selling false identification documents to undocumented aliens in order to allow them to remain and seek employment in the United States.

The Manner and Means of the Conspiracy

3. **GARCIA** and **PRIETO** used the following manner and means, among others, to achieve the object of the Conspiracy:

4. **GARCIA** maintained one or more telephone numbers, including without limitation (918) 991-4034.

5. Customers contacting **GARCIA** on (918) 991-4034 would inquire if **GARCIA** could provide documents for work.

6. **GARCIA** would ask what documents the customer wanted, sometimes referring to “both,” meaning a social security card and a lawful permanent resident or “LPR” card.

7. **GARCIA** would give the customer a price, which was usually \$140.00 for “both” and instruct the customer to text a head and shoulders photograph on a white background, and to provide the customer’s first and last name, date of birth, and country of birth.

8. The customer and **GARCIA** would then communicate to arrange a meeting place and time to exchange the false documents for the agreed price.

The Execution of the Conspiracy

9. On or about September 29, 2021, UC, a person known to the Grand Jury, sent a text message to (918) 991-4034 in Spanish, saying that UC had received her phone number from a friend and asking if **GARCIA** could get documents for work.

10. **GARCIA** responded asking if UC wanted both documents, meaning a social security card and a LPR card, and stated that for both cards it would cost \$140.00.

11. **GARCIA** also requested UC provide a photograph, first and last name, date of birth, and country of birth.

12. In response, UC provided to **GARCIA** a picture, name of “Marco Jimenez,” date of birth September 7, 1997, and birthplace of H. Matamoros, Tamaulipas, Mexico.

13. Later on that same date, UC asked **GARCIA** when they could pick up the documents, and **GARCIA** replied that the documents were completed.

14. On the next day, UC contacted **GARCIA** to arrange a time and place for the exchange. Through the exchange of various texts and voice calls, UC and **GARCIA** arranged to and met at or near 1408 North Harvard Avenue, Tulsa, Oklahoma, a location in the Northern District of Oklahoma.

15. At that time and place, **GARCIA** delivered to UC a false social security card bearing a number assigned to L.D.S., a deceased person known to the Grand Jury,

and a false LPR card bearing a number assigned to D.W., a British National and naturalized United States citizen known to the Grand Jury, in exchange for \$140.00 in cash, constituting false identification documents, which appeared to be issued under the authority of the United States, knowing that such documents were produced without lawful authority, and that the transfer of those documents was in and affecting interstate commerce.

All in violation of Title 18, United States Code, Sections 1028(f) and 1028(a)(2).

COUNT TWO
[18 U.S.C. §§ 1028(f) and 1028(a)(3)]

16. The allegations of Count One of this Indictment are incorporated in this Count by reference.

17. From on or about February 28, 2025, to the date of this Indictment, in the Northern District of Oklahoma, the defendants, **KARINA GARCIA SALAZAR**, a/k/a “Karla,” a/k/a “Chuekas,” a/k/a “Angeles Santos,” a/k/a “Angeles Santos Luz,” a/k/a “Reyna Martha Salazar Uribe,” and **AUGUSTO PRIETO-GAMBOA**, a/k/a “Augusto Prieto Regueira,” conspired, confederated, and agreed with each other and others, known and unknown to the Grand Jury, to knowingly possess with intent to transfer unlawfully five or more false identification documents, including without limitation United States Permanent Resident Cards and United States Social Security Cards, which appeared to be issued under the authority of the United States and another issuing authority, knowing that such documents were produced without lawful authority, and that the possession of the documents with intent to transfer was in and affecting interstate commerce.

All in violation of Title 18, United States Code, Sections 1028(f) and 1028(a)(3).

COUNT THREE
[18 U.S.C. § 1028A]

18. The allegations of Count One and Count Two of this Indictment are incorporated in this Count by reference.

19. On or about September 29, 2021, in the Northern District of Oklahoma, the defendant, **KARINA GARCIA SALAZAR**, a/k/a “Karla,” a/k/a “Chuekas,” a/k/a “Angeles Santos,” a/k/a “Angeles Santos Luz,” a/k/a “Reyna Martha Salazar Uribe,” knowingly and unlawfully possessed and transferred, without lawful authority, one or more means of identification of other persons known to the Grand Jury and designated herein as D.W. and as L.D.S., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, the sale and possession of a counterfeit lawful permanent resident card and a social security card, in violation of Title 18, United States Code, Section 1028(a)(2), knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION
[18 U.S.C. §§ 982(a) and 1028(b)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a), and 1028(b).

Upon conviction of the offenses alleged in this Indictment, as a part of each of their respective sentences, the defendants, **KARINA GARCIA SALAZAR**, a/k/a “Karla,” a/k/a “Chuekas,” a/k/a “Angeles Santos,” a/k/a “Angeles Santos Luz,” a/k/a “Reyna Martha Salazar Uribe,” and **JORGE AUGUSTO PRIETO-GAMBOA**, a/k/a “Augusto Prieto Regueira,” shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

CURRENCY

1. \$37,203.00 in United States currency;
2. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments, and easements thereon, and all rights appertaining thereto, located at 8935 E. 57th Street, Tulsa, Tulsa County, Oklahoma.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendants shall forfeit substitute property, up to the value

of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 982(a)(2), and 1028(b).

CLINTON J. JOHNSON
UNITED STATES ATTORNEY



CHARLES GREENOUGH
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson