

**FILED**

June 4, 2025

**SEALED**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: RR Deputy

**Case No: SA:25-CR-00322-XR**

**UNITED STATES OF AMERICA**

**Plaintiff**

**v**

**YOIRLAN TOME-ROJAS,**

**Defendant.**

**INDICTMENT**

**COUNT 1: 18 U.S.C. § 1590(a)**

Trafficking with Respect to Peonage, Slavery,  
Involuntary Servitude, or Forced Labor

**COUNT 2: 18 U.S.C. § 1590(a)**

Trafficking with Respect to Peonage, Slavery,  
Involuntary Servitude, or Forced Labor

**COUNT 3: 18 U.S.C. § 1590(a)**

Trafficking with Respect to Peonage, Slavery,  
Involuntary Servitude, or Forced Labor

**COUNT 4: 42 U.S.C. § 408(a)(7)(C)**

Social Security Card Alteration

**COUNT 5: 42 U.S.C. § 408(a)(7)(C)**

Social Security Card Alteration

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[18 U.S.C. § 1590(a)]**

Between approximately December 1, 2023, and March 14, 2024, in the Western District  
of Texas and elsewhere, Defendant,

**YOIRLAN TOME-ROJAS,**

did knowingly, recruit, provide, harbor, transport, or obtain by any means, a person, namely,  
Victim 1, with initials Y.S.C, for labor or services, in violation of Title 18, United States Code,

Section 1590.

**COUNT TWO**  
**[18 U.S.C. § 1590(a)]**

Between approximately December 1, 2023, and March 14, 2024, in the Western District of Texas and elsewhere, Defendant,

**YOIRLAN TOME-ROJAS**

did knowingly, recruit, provide, harbor, transport, or obtain by any means, a person, namely, Victim 2, with initials L.M.M.Q., for labor or services, in violation of Title 18, United States Code, Section 1590.

**COUNT THREE**  
**[18 U.S.C. § 1590(a)]**

Between approximately March 1, 2024, and March 14, 2024, in the Western District of Texas, Defendant,

**YOIRLAN TOME-ROJAS**

did knowingly, recruit, provide, harbor, transport, or obtain by any means, a person, namely, Victim 3, with initials Y.M.M., for labor or services, in violation of Title 18, United States Code, Section 1590.

**COUNT FOUR**  
**[42 U.S.C. § 408(a)(7)(C)]**

On or about December 28, 2023, in the Western District of Texas and elsewhere, Defendant,

**YOIRLAN TOME-ROJAS,**

for the purpose of obtaining for himself and any other person any payment or any other benefit to which he or Victim 1, with initials Y.S.C, is not entitled, or for the purpose of obtaining anything of value from any person, or for any purpose, the defendant knowingly bought a card that is or

purports to be a social security card, or sold a card that is or purports to be a social security card, in violation of Title 42, United States Code, Section 408(a)(7)(C).

**COUNT FIVE**  
**[42 U.S.C. § 408(a)(7)(C)]**

On or about December 28, 2023, in the Western District of Texas and elsewhere,  
Defendant,

**YOIRLAN TOME-ROJAS,**

for the purpose of obtaining for himself and any other person any payment or any other benefit to which he or Victim 2, with initials L.M.M.Q., is not entitled, or for the purpose of obtaining anything of value from any person, or for any purpose, the defendant knowingly bought a card that is or purports to be a social security card, or sold a card that is or purports to be a social security card, in violation of Title 42, United States Code, Section 408(a)(7)(C).

A TRUE BILL

FOREPERSON OF THE GRAND JURY

JUSTIN R. SIMMONS  
UNITED STATES ATTORNEY

BY:



FOR ALICIA McNAB  
Assistant United States Attorney