

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT DISTRICT OF VERMONT FILED

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UNITED STATES OF AMERICA,)
v.)
JOSE IGNACIO DE LA CRUZ DE LA ROSA,)
a/k/a "Nacho,")
[Redacted] and)
[Redacted])
Defendants.)

Case No.

CLERK [Signature]
DEPUTY CLERK

2:26-cr-19-123

BY [Signature]
DEPUTY CLERK

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U.S. DISTRICT COURT DISTRICT OF VERMONT FILED

INDICTMENT

The Grand Jury charges:

COUNT 1

From at least in or about October 2023 and continuing until in or about June 2025, in the District of Vermont and elsewhere, the defendants, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a "Nacho," and [Redacted] conspired with others known and unknown to the Grand Jury to commit offenses otherwise defined in 8 U.S.C. §§ 1324(a)(1)(A)(i) and (ii), specifically, bringing aliens to the United States at a place other than a designated port of entry and transporting aliens within the United States in furtherance of the aliens' illegal entry.

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i))

COUNT 2

Between on or about April 8, 2025, and on or about April 19, 2025, in the District of Vermont and elsewhere, the defendants, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a "Nacho," and [REDACTED], knowing and in reckless disregard of the fact that a certain alien, Y.G.F., had not received prior official authorization to come to, enter, and reside in the United States, did knowingly bring to the United States in any manner whatsoever, said alien, regardless of any official action which may later be taken with respect to said alien, and did aid, abet, counsel, command, induce, procure, and cause the same.

The defendant, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a "Nacho," did so for the purpose of private financial gain.

(8 U.S.C. §§ 1324(a)(2) and 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT 3

Between on or about April 8, 2025, and April 19, 2025, in the District of Vermont and elsewhere, the defendants, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a “Nacho,” knowing and in reckless disregard of the fact that a certain alien, A.I.H., had not received prior official authorization to come to, enter, and reside in the United States, did knowingly bring to the United States in any manner whatsoever, said alien, regardless of any official action which may later be taken with respect to said alien, and did so for private financial gain, and did aid, abet, counsel, command, induce, procure, and cause the same.

(8 U.S.C. §§ 1324(a)(2) and 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

COUNT 4

Beginning in or about November 2022, and continuing until in or about June 2025, in the District of Vermont and elsewhere, the defendants, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a “Nacho,” and [REDACTED] conspired with others known and unknown to the grand jury to knowingly and without lawful authority produce identity documents and false identity documents—specifically, Vermont driver’s licenses—which were transported in the mail in the course of the unauthorized production and the production of which was in and affected interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1028(a)(1) and 1028(c)(3).

(18 U.S.C. §§ 1028(f) & 1028(b)(1)(A)(ii))

COUNTS 5 THROUGH 9

On or about the following dates, in the District of Vermont and elsewhere, the defendants, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a “Nacho,” and [REDACTED] [REDACTED] knowingly and without lawful authority produced, attempted to produce, and aided and abetted the production of authentication documents and false identification documents—specifically, the listed Vermont driver’s licenses—which were transported in the mail in the course of the unauthorized production, and the production of which was in and affected interstate and foreign commerce.

| <u>Count</u> | <u>Date</u> | <u>Document</u> |
|--------------|----------------|---|
| 5 | March 17, 2024 | A Vermont driver’s privilege card in the name of [REDACTED] |
| 6 | April 29, 2025 | A Vermont driver’s privilege card in the name of M.A.G. |
| 7 | May 20, 2025 | A Vermont driver’s privilege card in the name of M.H.D.L.C. |
| 8 | May 27, 2025 | A Vermont learner’s privilege card in the name of D.A.H. |
| 9 | May 27, 2025 | A Vermont learner’s privilege card in the name of J.A.H. |

(18 U.S.C. §§ 1028(a)(1), 1028(b)(1)(A)(ii), 1028(c)(3), and 1028(f); 18 U.S.C. § 2)

FORFEITURE NOTICE ONE

1. The allegations of Counts 1, 2, and 3 of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a “Nacho,” has an interest.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, as alleged in Counts 1, 2, and 3 of this Indictment, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a “Nacho,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b)(1), and Title 28, United States Code, Section 2461:

a. any conveyance, including any vessel, vehicle, or aircraft, used in the commission of such offense;

b. any property, real or personal, that constitutes, or is derived from, or is traceable to any proceeds obtained, directly or indirectly, from the commission of such offense, include, but not limited to, \$15,000; and

c. any property, real or personal, that was used to facilitate, or intended to be used to facilitate, the commission of such offense, to include, but not limited to, a Samsung Galaxy S22+ smart phone associated with IMEI 356679320620736.

All pursuant to Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b)(1), and Title 28, United States Code, Section 2461 and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

(18 U.S.C. § 982(a)(6), 8 U.S.C. § 1324(b)(1), and 28 U.S.C. § 2461)

FORFEITURE NOTICE TWO

1. The allegations of Counts 4 through 9 of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a "Nacho," has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1028(a), as alleged in Counts 4 through 7 of this Indictment, JOSE IGNACIO DE LA CRUZ DE LA ROSA, a/k/a "Nacho," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 1028(b):

a. any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation, to include, but not limited to, \$3,000; and

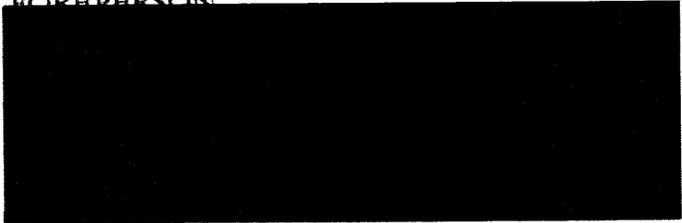
b. any personal property used or intended to be used to commit the offense.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B) and Title 18, United States Code, Section 1028(b) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).

(18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § 1028(b))

A TRUE BILL

FORFEITURE



JONATHAN A. OPHARDT
First Assistant United States Attorney

A handwritten signature in black ink, appearing to read "Joshua L. Banker", written over a horizontal line.

Joshua L. Banker
Assistant United States Attorney
Burlington, Vermont
February 19, 2026