

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
OFFICE OF THE CHIEF ADMINISTRATIVE HEARING OFFICER**

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UNITED STATES OF AMERICA,	)	
Complainant,	)	8 U.S.C. § 1324c Proceeding
	)	
v.	)	
	)	OCAHO Case No. 96C00027
PEDRO DOMINGUEZ,	)	
Respondent.	)	Judge Robert L. Barton, Jr.
_____	)	

**ORDER CORRECTING ADDENDUM ATTACHED TO ORDER PARTIALLY  
GRANTING COMPLAINANT’S MOTION FOR SUMMARY DECISION**  
*(November 14, 1997)*

An addendum, which summarized certain information in the evidentiary record, was attached to the October 17, 1997, Order Partially Granting Complainant’s Motion for Summary Decision. However, I gave leave to the parties to file, not later than November 3, 1997, a pleading specifically addressing any factual errors in the Addendum. Order at 17.

Both parties filed proposed corrections on November 3, 1997. With respect to the reference in the Addendum to CX-QQ-53, which concerns evidence packet 199 and paragraphs 2, 27, and 28 of the complaint, the Addendum stated that part of the reference to evidence packet 199 in CX-QQ-53 was blacked out. That was true of the original exhibit submitted by Complainant. However, as Complainant correctly notes in its November 3 pleading, Complainant provided the Court with unexpurgated copies of QQ-53 on February 18, 1997, and these copies should have been substituted for the original CX-QQ-53. Therefore, I am amending pages 28 and 30 of the October 17, 1997, Order to reflect the language of the unexpurgated copy of CX-QQ-53.<sup>1</sup>

Nevertheless, I would note that the reference to evidence packet 199 in the unexpurgated copy of CX-QQ-53 does not contain the language “Original counterfeit I-94s distributed by Respondent to Banda; returned to Respondent,” which appeared in Complainant’s Table of its Supplemental

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<sup>1</sup> The Addendum was in pages 28-39 of the October 17, 1997, Order.

Memorandum (SUM).<sup>2</sup> However, if Complainant believes that summary decision is appropriate as to paragraphs 2, 27, and 28 based on the unexpurgated CX-QQ-53, pursuant to the November 3, 1997, Amended Order Governing Prehearing Procedures (OGPP) it may file, not later than November 24, 1997, a succinct motion discussing why summary decision should be entered in favor of Complainant as to those paragraphs. As per the November 3 Order, Respondent's answer to the motion will be due not later than December 1, 1997. If I do not issue a written ruling on the motion prior to the prehearing conference, the motion will be one of the matters discussed during the December 23, 1997, telephone conference.

Complainant also notes a typographical error, namely the reference to "(N/A)" in column V with respect to paragraph 56. The "(N/A)" should be deleted. Respondent also points out a typographical error, asserting that the reference in the Addendum in column II with respect to paragraph 12 of the complaint should be CX-I-23-24, rather than CX-I-25-26. The reference in Complainant's Table in the SUM was CX-I-23-24, and that appears to be the correct reference. Therefore, the reference to paragraph 12 in the Addendum has been revised to refer to CX-I-23-24. I amend pages 29 and 34 of the October 17 Order to reflect those changes.

The revised Addendum is attached to this order with any corrected language in bold. Since the parties have not indicated any other mistakes or corrections, the rest of the Addendum to the October 17, 1997, Order has been retained.

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**ROBERT L. BARTON, JR.**  
**ADMINISTRATIVE LAW JUDGE**

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<sup>2</sup> The actual language, which was blacked out in CX-QQ-53 as it was originally submitted to the Court, states as follows: "Original counterfeit Soc Sec cards 265-25-8454, 467-13-6539, 450-49-6581, & original counterfeit I-210s and corresponding counterfeit I-94s for Enrique GARCIA, Jorge ALVAREZ, & Jose Luis GARCIA; SUBJECT DOMINGUEZ informed that these documents were distributed by S3B940003 and returned them because the aliens claimed they could not get employment with them." CX-QQ-53. The quoted language from CX-QQ-53 did not appear in Complainant's Table in the SUM with respect to either paragraphs 2, 27 or 28.

**ADDENDUM TO ORDER PARTIALLY GRANTING  
COMPLAINANT'S MOTION FOR SUMMARY DECISION**

Column I lists the I-94 as it is numbered in the complaint. Column II identifies by trial exhibit number (i.e. CX-I-1-12, these are two page documents, hence 1-2). Column III identifies the proper tag number on the package that the I-94s were placed in, when they were seized from the Respondent's home during the execution of the search warrant. Column IV identifies the trial exhibit where the Respondent made specific admissions concerning that individual I-94. Column V contains the admission itself, made by the Respondent regarding that specific I-94.

I	II	III	IV	V
1	CX-I-1-2	185	CX-QQ-54	Original counterfeit I-94's used for practice and not distributed
2	CX-I-3-4	199	CX-QQ-53	<b>Original counterfeit Soc Sec cards 265-25-8454, 467-13-6539, 450-49-6581, &amp; original counterfeit I-210s and corresponding counterfeit I-94s for Enrique GARCIA, Jorge ALVAREZ, &amp; Jose Luis GARCIA; SUBJECT DOMINGUEZ informed that these documents were distributed by S3B940003 and returned because the aliens claimed they could not get employment with them. SUBJECT DOMINGUEZ surmised that the recipient aliens may have wanted them for smuggling purposes and after using them wanted their money back</b>
3	CX-I-5-6	222	CX-RR-87	Seven photocopied counterfeit I-94s, one original counterfeit I-94, related counterfeit I-210 copies with counterfeit document instruction sheet and one counterfeit Webb County Birth Certificate distributed by Banda
4	CX-I-7-8	196	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
5	CX-I-9-10	196	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
6	CX-I-11-12	188	CX-QQ-54	Rejects of counterfeit I-94s not used
7	CX-I-13-14	48	CX-RR-83	Legitimate I-94s, unrelated to counterfeiting
8	CX-I-15-16	212	CX-RR-86	Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, Eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda

9	CX-I-17-18	230	CX-RR-87	I-94s used as facsimile material by SUBJECT DOMINGUEZ for counterfeiting
10	CX-I-19-20	185	CX-QQ-54	Original counterfeit I-94s used for practice and not distributed
11	CX-I-21-22	186	CX-QQ-54	Legitimate unrelated I-94 and practice counterfeit I-94s without photos
12	CX-I- <b>23-24</b>	E.12	CX-A-13	Seized at POE
13	CX-I-25-26	213	CX-RR-86	Twelve photocopied counterfeit I-94s, four original counterfeit I-94s and related photographs, distributed by Banda
14	CX-I-27-28	185	CX-QQ-54	Original counterfeit I-94s used for practice and not distributed
15	CX-I-29-30	186	CX-QQ-54	Legitimate unrelated I-94 and practice counterfeit I-94s without photos
16	CX-I-31-32	186	CX-QQ-54	Legitimate unrelated I-94 and practice counterfeit I-94s without photos
17	CX-I-33-34	187	CX-QQ-52	Unrelated legitimate I-94
18	CX-I-35-36	213	CX-RR-86	Twelve photocopied counterfeit I-94s, four original counterfeit I-94s and related photographs, distributed by Banda
19	CX-I-37-38	213	CX-RR-86	Twelve photocopied counterfeit I-94s, four original counterfeit I-94s and related photographs, distributed by Banda
20	CX-I-39-40	191	CX-QQ-54	Original counterfeit I-94s not mailed, SUBJECT DOMINGUEZ informed that he was not sure why they were not sent or who they were for
21	CX-I-42-42	191	CX-QQ-54	Original counterfeit I-94s not mailed, SUBJECT DOMINGUEZ informed that he was not sure why they were not sent or who they were for
22	CX-I-43-44	197	CX-QQ-53	Original counterfeit I-94s possibly returned by CAMACHO or not sent due to Camacho due to order cancellation. Also included in the packet was a photocopy of a previous CAMACHO counterfeit I-94 order dated 6/9/93, with pricing notation by SUBJECT DOMINGUEZ. SUBJECT DOMINGUEZ further informed that the code word "perdida" on the document order referred to a request for the counterfeit I-94 instruction sheet

- 23 CX-I-45-46 197 CX-QQ-53 Original counterfeit I-94s possibly returned by CAMACHO or not sent due to Camacho due to order cancellation. Also included in the packet was a photocopy of a previous CAMACHO counterfeit I-94 order dated 6/9/93, with pricing notation by SUBJECT DOMINGUEZ. SUBJECT DOMINGUEZ further informed that the code word "perdida" on the document order referred to a request for the counterfeit I-94 instruction sheet
- 24 CX-I-47-48 50 CX-RR-83 Unrelated legitimate I-94
- 25 CX-I-49-50 222 CX-RR-87 Seven photocopied counterfeit I-94s, one original counterfeit I-94, related counterfeit I-210 copies with counterfeit document instruction sheet and one counterfeit Webb County Birth Certificate distributed by Banda
- 26 CX-I-51-52 222 CX-RR-87 Seven photocopied counterfeit I-94s, one original counterfeit I-94, related counterfeit I-210 copies with counterfeit document instruction sheet and one counterfeit Webb County Birth Certificate distributed by Banda
- 27 CX-I-53-54 199 CX-QQ-53 **Original counterfeit Soc Sec cards 265-25-8454, 467-13-6539, 450-49-6581, & original counterfeit I-210s and corresponding counterfeit I-94s for Enrique GARCIA, Jorge ALVAREZ, & Jose Luis GARCIA; SUBJECT DOMINGUEZ informed that these documents were distributed by S3B940003 and returned because the aliens claimed they could not get employment with them.** SUBJECT DOMINGUEZ surmised that the recipient aliens may have wanted for smuggling purposes and after using them wanted their money back
- 28 CX-I-55-56 199 CX-QQ-53 **Original counterfeit Soc Sec cards 265-25-8454, 467-13-6539, 450-49-6581, & original counterfeit I-210s and corresponding counterfeit I-94s for Enrique GARCIA, Jorge ALVAREZ, & Jose Luis GARCIA; SUBJECT DOMINGUEZ informed that these documents were distributed by S3B940003 and returned because the aliens claimed they could not get employment with them.** SUBJECT DOMINGUEZ surmised that the recipient aliens may have wanted for smuggling purposes and after using them wanted their money back

- 29 CX-I-57-58 215 CX-RR-87 Eight photocopies counterfeit I-94s, two original counterfeit I-94s, one Mexican Birth Certificate, four Biographical pages from Mexican Birth Certificates, related photographs, distributed by Banda. Also included in the packet was correspondence from the U.S. Social Security Administration; SUBJECT DOMINGUEZ informed that the alien may have had trouble obtaining a legitimate Soc Sec card with his documents. He further informed that the document counterfeit date could be approximated to coincide with the date of issue of the document.
- 30 CX-I-59-60 EX9 CX-A-13 Seized at POE
- 31 CX-I-61-62 202 CX-RR-86 Four original counterfeit I-94s without photograph distributed and returned by Banda; SUBJECT DOMINGUEZ informed that I-94s lacking photographs were for use with a passport
- 32 CX-I-63-64 202 CX-RR-86 Four original counterfeit I-94s without photograph distributed and returned by Banda; SUBJECT DOMINGUEZ informed that I-94s lacking photographs were for use with a passport
- 33 CX-I-65-66 202 CX-RR-86 Four original counterfeit I-94s without photograph distributed and returned by Banda; SUBJECT DOMINGUEZ informed that I-94s lacking photographs were for use with a passport
- 34 CX-I-67-68 211 CX-RR-11 Photocopies of (9) counterfeit I-94 Departure Records, some with corresponding photographs, distributed by SUBJECT BANDA and (1) original counterfeit I-94 Departure Record returned to DOMINGUEZ by SUBJECT BANDA (Exhibit 45)
- 35 CX-I-69-70 202 CX-RR-86 Four original counterfeit I-94s without photograph distributed and returned by Banda; SUBJECT DOMINGUEZ informed that I-94s lacking photographs were for use with a passport
- 36 CX-I-71-72 217 CX-RR-87 Fourteen photocopied counterfeit I-94s and two original counterfeit I-94s with relating photographs distributed by BANDA; SUBJECT DOMINGUEZ informed that the original I-94s were returned via BANDA because the recipient of I-94 was too young to receive employment authorized and wanted a name change
- 37 CX-I-73-74 210 CX-RR-87 Ten photocopied counterfeit I-94s, four original counterfeit I-94s, related photographs, distributed by BANDA; SUBJECT DOMINGUEZ informed that the I-94s were returned for name changes etc. via BANDA

38	CX-I-75-76 196	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
39	CX-I-77-78 196	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
40	CX-I-79-80 188	CX-QQ-54	Rejects of counterfeit I-94s not used
41	CX-I-81-82 192	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
42	CX-I-83-84 192	CX-QQ-54	Original counterfeit I-94s that were counterfeited for Camacho but not mailed
43	CX-I-85-86 210	CX-RR-87	Ten photocopied counterfeit I-94s, four original counterfeit I-94s, related photographs, distributed by BANDA; SUBJECT DOMINGUEZ informed that the I-94s were returned for name changes etc. via BANDA
44	CX-I-87-88 210	CX-RR-87	Ten photocopied counterfeit I-94s, four original counterfeit I-94s, related photographs, distributed by BANDA; SUBJECT DOMINGUEZ informed that the I-94s were returned for name changes etc. via BANDA
45	CX-I-89-90 227	CX-RR-11	Photocopies of (2) counterfeit I-94 Departure Records distributed by SUBJECT BANDA, and (1) original counterfeit I-94 Departure Record returned to DOMINGUEZ by SUBJECT BANDA. Also in the pack was (1) original piece of paper with biographical information written in handwriting identified as SUBJECT BANDA's by DOMINGUEZ (Exhibit 44)
46	CX-I-91-92 223	CX-RR-9	Photocopies of (8) counterfeit I-94 Departure Records distributed by SUBJECT BANDA. Also included in the pack were (2) original I-94 Departure Records returned by SUBJECT BANDA to DOMINGUEZ for extensions (Exhibit 33)
47	CX-I-93-94 224	CX-RR-86	Eleven photocopied counterfeit I-94s, three original counterfeit I-94s and related photographs, which were distributed by BANDA

- 48 CX-I-95-96 51 CX-RR-83 Counterfeit I-94 used by intermediary Guillermo AVILA RANGEL; AVILA RANGEL did not pay for the doc. but knew it was counterfeit. SUBJECT DOMINGUEZ informed that a legit. I-94 was not issued to AVILA RANGEL because it was too much paperwork. AVILA RANGEL was an informant that did not produce. Also included in the packet was the legitimate ORIGINAL I-94 WITH PHOTO FOR INTERMEDIARY MARIO ALBERTO RODRIGUEZ PEREZ. RODRIGUEZ PEREZ provided a counterfeit I-94 produced by SUBJECT DOMINGUEZ, also in the packet, to Javier FLORES HERNANDEZ, a smuggler; SUBJECT DOMINGUEZ informed that he provided the counterfeit I-94 to the smuggler via RODRIGUEZ PEREZ as an unorthodox investigative technique so that he could get a photo of the smuggler for future use. He informed that INS would not approve of this technique so he went outside normal channels. He informed that no money was paid to him by RODRIGUEZ PEREZ for the doc. and he did not know if RODRIGUEZ PEREZ was paid by the smuggler for the document.
- 49 CX-I-97-98 227 CX-RR-11 Photocopies of (2) counterfeit I-94 Departure Records distributed by SUBJECT BANDA, and (1) original counterfeit I-94 Departure Record returned to DOMINGUEZ by SUBJECT BANDA. Also in the pack was (1) original piece of paper with biographical information written in handwriting identified as SUBJECT BANDA's by DOMINGUEZ (Exhibit 44)
- 50 CX-I-99-100 195 CX-QQ-54 Original counterfeit I-94s used for ink tests
- 51 CX-I-101-102 195 CX-QQ-54 Original counterfeit I-94s used for ink tests
- 52 CX-I-103-104 48 CX-RR-83 Legitimate I-94s, unrelated to counterfeiting



- 53 CX-I-105-106 190 CX-QQ-53 Original CAMACHO counterfeit I-94 order letter with envelop addressed To SUBJECT DOMINGUEZ's mail drop of Juanita AVILA, PO Box 1680, Laredo, TX 78044, for Raymundo RODRIGUEZ MARTINEZ, Carlos SALVADOR GUZMAN, Osvaldo MARTINEZ ESPINOZA, Simon PEDRO RODRIGUEZ, Herlinda FLORES DOMINGUEZ, Catalina LOPEZ BARRITA with corresponding DOBs & admission dates and numbering system for related photographs; SUBJECT DOMINGUEZ marked each name with corresponding prices from \$125.00 to \$150.00. Also included in the correspondence were additional references by CAMACHO to past orders and money he still owed SUBJECT DOMINGUEZ for those documents. Also included were photocopies of counterfeit I-94s (list of numbers) which were made for CAMACHO and not mailed
- 54 CX-I-107-108 190 CX-QQ-53 Original CAMACHO counterfeit I-94 order letter with envelop addressed To SUBJECT DOMINGUEZ's mail drop of Juanita AVILA, PO Box 1680, Laredo, TX 78044, for Raymundo RODRIGUEZ MARTINEZ, Carlos SALVADOR GUZMAN, Osvaldo MARTINEZ ESPINOZA, Simon PEDRO RODRIGUEZ, Herlinda FLORES DOMINGUEZ, Catalina LOPEZ BARRITA with corresponding DOBs & admission dates and numbering system for related photographs; SUBJECT DOMINGUEZ marked each name with corresponding prices from \$125.00 to \$150.00. Also included in the correspondence were additional references by CAMACHO to past orders and money he still owed SUBJECT DOMINGUEZ for those documents. Also included were photocopies of counterfeit I-94s (list of numbers) which were made for CAMACHO and not mailed
- 55 CX-I-109-110 209 CX-RR-86 Copies of seventeen counterfeit I-94s distributed by SUBJECT DOMINGUEZ by Banda, two original counterfeit I-94s and copy of a counterfeit I-210; seven duplicate photos used to make the counterfeit I-94s were also in the packet. Six photocopied counterfeit I-94s, one original counterfeit I-94, three expanded counterfeit I-94s, one counterfeit document instruction sheet and six related photos. SUBJECT DOMINGUEZ informed that the I-94s were distributed by BANDA. He further revealed that BANDA 's work was done hand to hand and CAMACHO used the mail and orders were returned via Federal Express.
- 56 CX-I-111-112 EX11 CX-RR-18 Seized at POE

- 57 CX-I-113-114 227 CX-RR-11 Photocopies of (2) counterfeit I-94 Departure Records distributed by SUBJECT BANDA, and (1) original counterfeit I-94 Departure Record returned to DOMINGUEZ by SUBJECT BANDA. Also in the pack was (1) original piece of paper with biographical information written in handwriting identified as SUBJECT BANDA's by DOMINGUEZ (Exhibit 44)
- 58 CX-I-115-116 204 CX-RR-86 Photocopies of twelve counterfeit I-94s and four corresponding counterfeit I-94s connoting extensions of same distributed to aliens by Banda
- 59 CX-I-117-118 EX11 CX-A-13 Seized at POE
- 60 CX-I-119-120 50 CX-RR-83 Unrelated legit I-94
- 61 CX-I-121-122 185 CX-QQ-54 Original counterfeit I-94s used for practice and not distributed
- 62 CX-I-123-124 192 CX-QQ-54 Original counterfeit I-94s that were counterfeited for Camacho but not mailed
- 63 CX-I-125-126 192 CX-QQ-54 Original counterfeit I-94s that were counterfeited for Camacho but not mailed
- 64 CX-I-127-128 212 CX-RR-86 Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, Eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda
- 65 CX-I-129-130 201 CX-RR-85 Original counterfeit I-94 given to alien by Banda, SUBJECT DOMINGUEZ informed that the alien rejected the counterfeit I-94 and wanted another I-94 with a corrected name of Maria DEJESUS HERERRA which was counterfeited and provided to her by Banda. SUBJECT DOMINGUEZ informed he did not know how much was paid for the I-94
- 66 CX-I-131-132 210 CX-RR-87 Ten photocopied counterfeit I-94s, four original counterfeit I-94s, related photographs, distributed by BANDA; SUBJECT DOMINGUEZ informed that the I-94s were returned for name changes etc via BANDA

- 67 CX-I-133-134 212 CX-RR-86 Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, Eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda
- 68 CX-I-135-136 193\* CX-QQ-54 Original counterfeit I-94s not mailed
- 69 CX-I-137-138 193\* CX-QQ-54 Original counterfeit I-94s not mailed
- 70 CX-I-139-140 207 CX-RR-86 Ten photocopied counterfeit I-94s, one original counterfeit I-94, which was distributed by Banda
- 71 CX-I-141-142 205 CX-RR-86 Photocopy of two counterfeit I-94s and one original counterfeit I-94 distributed to aliens by Banda.
- 72 CX-I-143-144 EX10 CX-A-13 Seized at POE
- 73 CX-I-145-146 185 CX-QQ-54 Original counterfeit I-94s used for practice and not distributed
- 74 CX-I-147-148 187 CX-QQ-52 Unrelated legitimate I-94
- 75 CX-I-149-150 51 CX-RR-83 Counterfeit I-94 used by intermediary Guillermo AVILA RANGEL; AVILA RANGEL did not pay for the doc. but knew it was counterfeit. SUBJECT DOMINGUEZ informed that a legit. I-94 was not issued to AVILA RANGEL because it was too much paperwork. AVILA RANGEL was an informant that did not produce. Also included in the packet was the legitimate ORIGINAL I-94 WITH PHOTO FOR INTERMEDIARY MARIO ALBERTO RODRIGUEZ PEREZ. RODRIGUEZ PEREZ provided a counterfeit I-94 produced by SUBJECT DOMINGUEZ, also in the packet, to Javier FLORES HERNANDEZ, a smuggler; SUBJECT DOMINGUEZ informed that he provided the counterfeit I-94 to the smuggler via RODRIGUEZ PEREZ as an unorthodox investigative technique so that he could get a photo of the smuggler for future use. He informed that INS would not approve of this technique so he went outside normal channels. He informed that no money was paid to him by RODRIGUEZ PEREZ for the doc. and he did not know if RODRIGUEZ PEREZ was paid b the smuggler for the document
- 76 CX-I-151-152 213 CX-RR-86 Twelve photocopied counterfeit I-94s, four original counterfeit I-94s and related photographs, distributed by Banda

- 77 CX-I-153-154 212 CX-RR-86 Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, Eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda
- 78 CX-I-155-156 193\* CX-QQ-54 Original counterfeit I-94s not mailed
- 79 CX-I-157-158 193\* CX-QQ-54 Original counterfeit I-94s not mailed
- 80 CX-I-159-160 212 CX-RR-86 Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, Eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda
- 81 CX-I-161-162 191 CX-QQ-54 Original counterfeit I-94s not mailed. SUBJECT DOMINGUEZ informed that he was not sure why they were sent or who they were for
- 82 CX-I-163-164 188 CX-QQ-54 Rejects of counterfeit I-94s not used
- 83 CX-I-165-166 189 CX-QQ-53 Four aliens photos mailed to SUBJECT DOMINGUEZ by CAMACHO for use in counterfeiting I-94s; SUBJECT DOMINGUEZ was not sure which order batch the photos belonged to; additional evidence in the form of type font practice work conducted by SUBJECT DOMINGUEZ to enhance counterfeiting skills
- 84 CX-I-167-168 191 CX-QQ-54 Original counterfeit I-94s not mailed; SUBJECT DOMINGUEZ informed that he was not sure why they were not sent or who they were for
- 85 CX-I-169-170 192 CX-QQ-54 Original counterfeit I-94s that were counterfeited for Camacho but not mailed
- 86 CX-I-171-172 191 CX-QQ-54 Original counterfeit I-94s not mailed; SUBJECT DOMINGUEZ informed that he was not sure why they were not sent or who they were for

- 87 CX-I-173-174 189 CX-QQ-53 Four aliens photos mailed to SUBJECT DOMINGUEZ by CAMACHO for use in counterfeiting I-94s; SUBJECT DOMINGUEZ was not sure which order batch the photos belonged to; additional evidence in the form of type font practice work conducted by SUBJECT DOMINGUEZ to enhance counterfeiting skills
- 88 CX-I-175-176 51 CX-RR-83 Counterfeit I-94 used by intermediary Guillermo AVILA RANGEL; AVILA RANGEL did not pay for the doc. but knew it was counterfeit. SUBJECT DOMINGUEZ informed that a legit. I-94 was not issued to AVILA RANGEL because It was too much paperwork. AVILA RANGEL was an informant that did not produce. Also included in the packet was the legitimate ORIGINAL I-94 WITH PHOTO FOR INTERMEDIARY MARIO ALBERTO RODRIGUEZ PEREZ. RODRIGUEZ PEREZ provided a counterfeit I-94 produced by SUBJECT DOMINGUEZ, also in the packet, to Javier FLORES HERNANDEZ, a smuggler; SUBJECT DOMINGUEZ Informed that he provided the counterfeit I-94 to the smuggler via RODRIGUEZ PEREZ as an unorthodox investigative technique so that he could get a photo of the smuggler for future use. He informed that INS would not approve of this technique so he went outside normal channels. He informed that no money was paid to him by RODRIGUEZ PEREZ for the doc. and he did not know if RODRIGUEZ PEREZ was paid by the smuggler for the document
- 89 CX-I-177-178 48 CX-RR-83 Legitimate I-94s unrelated to counterfeiting
- 90 CX-I-179-180 217 CX-RR-87 Fourteen photocopied counterfeit I-94s and two original counterfeit I-94s with relating photographs distributed by BANDA; SUBJECT DOMINGUEZ informed that the original I-94s were returned via BANDA because the Recipient of I-94 ? was too young to receive employment authorized and ? wanted a name change
- 91 CX-I-181-182 196 CX-QQ-54 Original counterfeit I-94s that were counterfeited for Camacho but not mailed

- 92 CX-I-183-184 197 CX-QQ-53 Original counterfeit I-94s possibly returned by CAMACHO or not sent due to Camacho due to order cancellation. Also included in the packet was a photocopy of a previous CAMACHO counterfeit I-94 order dated 6/9/93, with pricing notation by SUBJECT DOMINGUEZ. SUBJECT DOMINGUEZ further informed that the code word "perdida" on the document order referred to a request for the counterfeit I-94 instruction sheet
- 93 CX-I-185-186 212 CX-RR-86 Eighteen photocopied counterfeit I-94's, one partially completed original counterfeit I-94, six original counterfeit I-94s, one counterfeit I-94 instruction sheet, six related photographs, which were distributed by Banda, eleven photocopied counterfeit I-94s, two original counterfeit I-94s and related photographs, which were distributed by Banda
- 94 CX-I-187-188 221 CX-RR-87 Fourteen photocopied counterfeit I-94s, one original counterfeit I-94, three photocopies of counterfeit Social Security cards and a counterfeit I-94 instruction sheet distributed by Banda
- 95 CX-I-189-190 224 CX-RR-86 Eleven photocopied counterfeit I-94s, three original counterfeit I-94s and related photographs, which were distributed by BANDA
- 96 CX-I-191-192 195 CX-QQ-54 Original counterfeit I-94s used for ink tests
- 97 CX-I-193-194 195 CX-QQ-54 Original counterfeit I-94s used for ink tests
- 98 CX-I-195-196 211 CX-RR-11 Photocopies of (9) counterfeit I-94 Departure Records, some with corresponding photographs, distributed by SUBJECT BANDA and (1) original counterfeit I-94 Departure Record returned to DOMINGUEZ by SUBJECT BANDA (Exhibit 45)
- 99 CX-I-197-198 EX3 CX-RR-4 Later in the day on 9/23/93, SUBJECT BANDA was arrested by the Anti-Smuggling Unit, ASU, Laredo, TX for the sale of the (2) counterfeit I-94 Departure Records to LOPEZ HERNANDEZ and MARTIN MORALES. SUBJECT BANDA admitted under oath that he started selling counterfeit I-94 Departure Records for DOMINGUEZ approximately (1.5) years ago. He also admitted that DOMINGUEZ charged him approximately \$200.00 per document and that he sold approximately (10) documents per month (Exhibit 3)

- 100 CX-I-199-200 EX3 CX-RR-4 Later in the day on 9/23/93, SUBJECT BANDA was arrested by the Anti-Smuggling Unit, ASU, Laredo, TX for the sale of the (2) counterfeit I-94 Departure Records to LOPEZ HERNANDEZ and MARTIN MORALES. SUBJECT BANDA admitted under oath that he started selling counterfeit I-94 Departure Records for DOMINGUEZ approximately (1.5) years ago. He also admitted that DOMINGUEZ charged him approximately \$200.00 per document and that he sold approximately (10) documents per month (Exhibit 3)
- 101 CX-I-201-202 197 CX-QQ-53 Original counterfeit I-94s possibly returned by CAMACHO or not sent due to Camacho due to order cancellation. Also included in the packet was a photocopy of a previous CAMACHO counterfeit I-94 order dated 6/9/93, with pricing notation by SUBJECT DOMINGUEZ. SUBJECT DOMINGUEZ further informed that the code word "perdida" on the document order referred to a request for the counterfeit I-94 instruction sheet
- 102 CX-I-203-204 197 CX-QQ-53 Original counterfeit I-94s possibly returned by CAMACHO or not sent due to Camacho due to order cancellation. Also included in the packet was a photocopy of a previous CAMACHO counterfeit I-94 order dated 6/9/93, with pricing notation by SUBJECT DOMINGUEZ. SUBJECT DOMINGUEZ further informed that the code word "perdida" on the document order referred to a request for the counterfeit I-94 instruction sheet
- 103 CX-I-205-206 EX9 CX-A-13 Seized at POE

\* Complainant had referred to evidence packet 194, but there is no such reference in QQ-54. It appears that the correct reference is evidence packet 193.

## CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of November, 1997, I have served the foregoing Order Correcting Addendum Attached to Order Partially Granting Complainant's Motion for Summary Decision, on the following persons, by first class mail (unless otherwise indicated), at the addresses shown:

Jane H. Thomson  
Assistant District Counsel  
Immigration and Naturalization Service  
P.O. Box 34178  
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Office of Chief Administrative Hearing Officer  
Skyline Tower Building  
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Falls Church, Virginia 22041  
(Hand delivered)

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Linda S. Hudecz  
Legal Technician to Robert L. Barton, Jr.  
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5107 Leesburg Pike, Suite 1905  
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