

**AFFIDAVIT OF SPECIAL AGENT TIMOTHY TABER IN SUPPORT OF  
A CRIMINAL COMPLAINT**

I, Timothy Taber, having been sworn, state:

**Introduction and Agent Background**

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), and have been so employed since May 2018. I have received formal training in conducting criminal investigations at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to becoming a Special Agent with HSI, I was an Intelligence Analyst with the Federal Bureau of Investigation for approximately ten years, where I participated in a variety of investigations including violent gangs and drug trafficking. In 2005, I graduated from Northeastern University with a bachelor’s degree in criminal justice and from Suffolk University in 2006 with a master’s degree in criminal justice.

2. I am currently assigned to the HSI New England Document and Benefit Fraud Task Force (“DBFTF”), a specialized field investigative group comprised of personnel from various state, local, and federal agencies with expertise in detecting, deterring, and disrupting organizations and individuals involved in various types of document, identity, financial, and benefit fraud schemes. As part of this task force, I am responsible for conducting investigations involving, but not limited to, the manufacturing, counterfeiting, alteration, sale, and use of identity documents and other fraudulent documents to evade law enforcement or for other criminal activity. Due to my training and experience, as well as conversations with other law enforcement officers, I am familiar with the methods, routines, and practices of document counterfeiters, vendors, and persons who fraudulently obtain or assume false identities.

3. I have participated in various aspects of investigations into the use and manufacture of fraudulent documents, including conducting physical surveillance, surveillance of controlled

purchases involving undercover agents and/or cooperating witnesses, the introduction of undercover agents, the execution of search warrants, the effecting of arrests, and the debriefing of defendants, informants, and witnesses.

**Purpose of Affidavit**

4. I submit this affidavit in support of an application for a criminal complaint charging Mercedes Orquidea Soto Capellan (“Mercedes Soto” or “Soto”) with Illegal Acquisition or Use of Supplemental Nutrition Assistance Program (“SNAP”) Benefits, in violation of 7 U.S.C. § 2024(b).

5. This affidavit is based on my personal knowledge, information provided to me by other law enforcement officers and federal agents, and my review of records described herein. This affidavit is not intended to set forth all of the information that I have learned during this investigation but includes only the information necessary to establish probable cause for the requested criminal complaint and search warrant.

**Background Information on SNAP**

6. SNAP is a government benefit funded by the American taxpayer. Congress enacted SNAP to “promote the general welfare, to safeguard the health and well-being of the nation’s population by raising levels of nutrition among low-income households.” 7 U.S.C. § 2011. This program seeks to enable low-income households to obtain a more nutritious diet by increasing their food purchasing power.

7. Under the program, eligible households receive food stamps in the form of credits to an electronic benefit card to buy food from retail food stores that participate in SNAP. Food stamp benefits are obligations of the United States and redeemable at face value by the Secretary through the facilities of the Treasury of the United States. 7 U.S.C. § 2024(d). USDA administers

SNAP nationally. Individuals or families that are in need of SNAP benefits may apply for assistance through the Massachusetts Department of Transitional Assistance (“DTA”).

8. To qualify for SNAP in Massachusetts, the applicant must be a resident of Massachusetts, meet the financial eligibility requirements, and be a United States citizen or an eligible non-citizen, such as Lawful Permanent Resident (LPR) who has earned, or can be credited with, 40 quarters of work. An applicant for SNAP benefits must also provide proof of their identity; *i.e.*, the applicant must be the person who they claim to be. An applicant must also furnish a Social Security number (“SSN”) or provide proof that the applicant has applied for one.

9. Massachusetts uses the Electronic Benefit Transfer (“EBT”) system for SNAP benefits. The EBT system uses plastic debit cards, which are automatically credited with the recipient’s appropriate amount of benefits during certain times of each month. To access benefits, the recipient presents the card at an authorized retailer’s location. The card is swiped through an electronic terminal device (commonly and hereinafter referred to as an “EBT terminal”) which reads coded information on the card’s magnetic strip. The transaction amount is deducted from the EBT card’s balance and deposited into the retailer’s account.

10. An applicant for SNAP benefits must provide complete and accurate information both at the time of application and on an ongoing basis in order to properly assess initial and continued eligibility for benefits. All applicants must acknowledge this in the application. It is unlawful to knowingly use, transfer, acquire, alter, or possess SNAP benefits in any manner contrary to Title 7 of United States Code or the regulations issued by the USDA. It is unlawful to knowingly use, transfer, acquire, alter, or possess SNAP benefits in any manner contrary to Title 7 of United States Code or the regulations issued by the USDA.

### **Probable Cause**

11. The HSI New England DBFTF is currently investigating a group of undocumented persons who are believed to have obtained stolen identities of United States citizens, most of whom reside in Puerto Rico, and used those identities to obtain public benefits that they would not otherwise be eligible to receive, such as SSNs, SNAP, Supplemental Security Income (“SSI”), MassHealth, and United States passports.

12. In January 2025, federal agents conducted an analysis of SNAP recipient data to detect identities (names, dates of birth, and SSNs) receiving SNAP benefits in multiple states during certain time periods. It is unlawful for a person to receive SNAP benefits in more than one state in any month. The analysis revealed that, in December 2024, Massachusetts DTA issued SNAP benefits to approximately 495 identities simultaneously receiving SNAP benefits in Puerto Rico.

13. H.R.G.M.<sup>1</sup> was one of the identities who received SNAP benefits in Massachusetts and Puerto Rico simultaneously. An identity receiving SNAP and other government benefits in more than one state simultaneously is an indicator of identity theft.

### **Identification of the True H.R.G.M.**

14. On February 20, 2026, an agent from the Social Security Administration Office of the Inspector General interviewed the individual who received SNAP benefits in Puerto Rico under H.R.G.M.’s name. This individual provided biographical information—including her place of

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<sup>1</sup> The identity of victim H.R.G.M. is known to the government. The victim’s full name is H.R.G.M. In order, these initials represent the victim’s first name, middle name, paternal last name and maternal last name. To protect the victim’s privacy and for consistency, only the initials “H.R.G.M.” are used in this affidavit to reflect the variations of the victim’s full name.

birth, date of birth of xx-xx-1973, and SSN of xxx-xx-2196.<sup>2</sup>

15. H.R.G.M. reported that she had previously received SNAP benefits while living in Puerto Rico. She clarified that she had never received SNAP benefits in Massachusetts, nor had she ever lived in or traveled to Massachusetts. H.R.G.M. also indicated that she had never applied for a Massachusetts driver's license, Massachusetts health benefits, or a United States passport.

**Identification of the Individual Posing as H.R.G.M.**

16. To identify the individual posing as H.R.G.M. in Massachusetts, law enforcement reviewed Department of State records. Those records reflect that, on August 16, 2004, an individual completed a passport application in H.R.G.M.'s name at a United States Post Office in Roxbury, Massachusetts. The individual listed her birthplace as Puerto Rico, with a date of birth of xx-xx-1973 and SSN xxx-xx-2196. For proof of citizenship, the applicant presented, among other things, a Massachusetts driver's license in H.R.G.M.'s name with an address in Lawrence, Massachusetts. She also submitted a photograph in connection with her passport application.<sup>3</sup>



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<sup>2</sup> The SSN and DOB have been partially redacted herein. The redacted SSN and DOB referenced in the Affidavit are identical unless otherwise noted. The Social Security Administration, Office of Inspector General has confirmed that SSN xxx-xx-2196 is assigned to H.R.G.M.

<sup>3</sup> A United States passport was ultimately issued in H.R.G.M.'s name.

17. Law enforcement subsequently identified a Facebook profile in H.R.G.M.'s name, with the user's location listed as Lawrence, Massachusetts. On July 24, 2023, the account had uploaded a "reel" video with a younger woman at what appears to be a children's birthday party.



Photograph posted to the "H.R.G.M." Facebook profile. The account owner is pictured top right.

18. Facebook's "Reaction" function allows users to select preset icons to express a specific emotional response to a post without writing text. Several users selected the "love" icon for the above photograph, including Person-1.<sup>4</sup> Person-1's Facebook profile states that he is married to Beisy Soto, whose profile lists the Dominican Republic as her "hometown" and indicates that she currently lives near Boston, Massachusetts. Based on photographs uploaded by Beisy Soto, she appears to be the unidentified individual pictured above (top left). On May 4,

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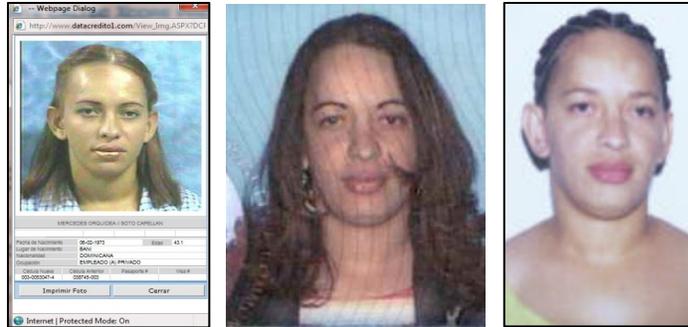
<sup>4</sup> Person-1's identity is known to law enforcement and the affiant. He is referred to pseudonymously to protect his identity.

2016, she uploaded a photograph with an individual who closely resembles the H.R.G.M. Facebook user. That photograph is captioned, “I ♥ Mom.”



19. According to the Department of State’s Consular Consolidated Database (the “Consular Database”), Beisy Soto submitted a United States visa application that was denied on March 11, 2014. On her visa application, she listed her mother as Mercedes Soto. The Dominican Republic’s “Cedula” database, which houses information about the mandatory national identification card for citizens and legal residents of the Dominican Republic, also reflects that Beisy Soto’s mother is Mercedes Soto, a Dominican national.

20. Law enforcement subsequently reviewed a digital image of Mercedes Soto’s Cedula. The photograph on her Dominican identification card appears to depict the same woman (at a younger age) who obtained a Massachusetts driver’s license and United States passport using the H.R.G.M. identity.



*Left to right: Mercedes Soto's Cedula photograph (cedula record reflects 1999); Massachusetts driver's license photograph for the H.R.G.M. identity (2006); United States passport photograph for the H.R.G.M. identity (2004)*

21. The Department of State's Consular Database indicates that Mercedes Soto applied for a United States visa in the Dominican Republic on September 18, 1996. Her visa request was denied. There are no records of any subsequent visa applications by Mercedes Soto, and she has not otherwise obtained lawful immigration status in the United States.

### **Criminal History**

22. In January 2016, Soto—while living under H.R.G.M.'s identity—was arrested following the execution of a search warrant at a Tewksbury, Massachusetts residence where she and another individual, Person-2, were present.<sup>5</sup> During this search, authorities discovered 30 kilograms of suspected heroin and approximately \$20,000.

23. After accounting for the effects of aging, post-arrest photographs of the individual posing as H.R.G.M. resemble the individual depicted on Soto's undated Cedula card and the Massachusetts driver's license and United States passport obtained using the H.R.G.M. identity.

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<sup>5</sup> Person-2's identity is known to law enforcement and the affiant. He is referred to pseudonymously to protect his identity.



*Left to right:* Mercedes Soto's Cedula photograph (cedula record dated 1999); Massachusetts driver's license photograph for the H.R.G.M. identity (2006); United States passport photograph for the H.R.G.M. identity (2004); post-arrest photographs of the individual posing as H.R.G.M. in Massachusetts (both 2016)

24. In 2018, Soto was convicted—under H.R.G.M.'s name—of: (i) Trafficking Heroin, (ii) Possession of a Controlled Substance with Intent to Distribute (Fentanyl), (iii) Conspiracy – Trafficking (Heroin), and (iv) Conspiracy to Violate the Controlled Substance Act with Intent to Distribute Fentanyl. She was sentenced to five to seven years in state prison.

### **Benefits Unlawfully Obtained**

25. According to MA DTA records, an individual posing as H.R.G.M. applied for SNAP benefits on or about February 4, 2021, around the time that she was released from state prison. On the application, that individual identified herself as H.R.G.M., with the date of birth xx-xx-1973, SSN xxx-xx-2196, and an address in Lawrence, Massachusetts. She also signed H.R.G.M.'s name, certifying, "I have read the entire form (or someone has read it for me in a language I understand), including the section on rights and responsibilities, and I understand that I must comply with these rules. To the best of my knowledge and belief, the information I have provided is true and complete. I could go to prison or be required to pay fines if I intentionally provide false, incomplete, or misleading information." This individual later reapplied for SNAP benefits on August 1, 2023, again providing H.R.G.M.'s birthdate and SSN, and certifying that the

information she had provided was “true and complete.”

26. MA DTA records reflect that, between February 2021 and June 2025, Soto received \$16,052 in SNAP benefits from Massachusetts while posing as H.R.G.M.

### **MassHealth Benefits**

27. Soto has also used H.R.G.M.’s identity to defraud the Medicaid Program. The Medicaid Program is a joint federal-state program that provides health coverage to certain categories of people, including eligible low-income adults, children, pregnant women, the elderly, and people with disabilities. Medicaid is administered by the states, according to federal requirements, and is funded jointly by the states and the federal government. MassHealth is the Medicaid Program in Massachusetts. Providing false material information to obtain health benefits is unlawful. *See, e.g.*, 18 U.S.C. §§ 1035 and 1347.

28. According to MassHealth records, an individual purporting to be H.R.G.M. first began receiving MassHealth benefits in 2004. In July 2018, that individual—Soto—with the assistance of a Massachusetts Department of Corrections counselor, submitted an application to ensure she could receive MassHealth benefits while incarcerated. On this application, Soto provided her MassHealth identification number (xxxx-xxxx-8911), and listing her birthdate as xx-xx-1973 and her SSN as xxx-xx-2196. Five years later, on August 10, 2023, she submitted a handwritten letter to MassHealth verifying her address in Lawrence, Massachusetts, and listing the same MassHealth identification number.

29. MassHealth records reflect that, between January 2021 and April 2025, Soto—using H.R.G.M.’s identity and SSN—received approximately \$49,469 in MassHealth benefits.

**Conclusion**

30. Based on the foregoing, I submit that there is probable cause to believe that between February 2021 through June 2025, Mercedes Orquidea Soto Capellan, posing as H.R.G.M., knowingly acquired \$16,052 in Massachusetts SNAP benefits, in violation of 7 U.S.C. § 2024(b).

Sworn to under the pains and penalties of perjury,

  
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Special Agent Timothy Taber  
Homeland Security Investigations

SWORN before me telephonically pursuant to Fed. R. Crim. P. 4.1(d)(3) this **Mar 6, 2026** day of March 2026.

  
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HONORABLE JUDITH G. DEIN  
UNITED STATES MAGISTRATE JUDGE