UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-CR-20131-BECERRA

UNITED STATES OF AMERICA

v.

ABEL HUMBERTO PERLA BONILLA,

Defendant.
______________________________________/

FACTUAL PROFFER

The United States of America and the defendant, Abel Humberto Perla Bonilla, agree that had this case proceeded to trial, the United States would have proven, beyond a reasonable doubt, the following facts, among others, pertaining to a violation of 18 U.S.C. § 1349 that occurred in the Southern District of Florida and elsewhere.

Unemployment Insurance ("UI") was a joint state and federal program that provided monetary benefits to eligible beneficiaries. UI payments were intended to provide temporary financial assistance to lawful workers who were unemployed through no fault of their own. Beginning in March 2020, in response to the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including the Pandemic Unemployment Assistance Program, Federal Pandemic Unemployment Compensation Program, and the Lost Wages Assistance Program. In the State of California, the Employment Development Department (EDD), based in Sacramento, California, administered the UI program. Those seeking UI benefits submitted online applications. In order to successfully file an unemployment claim with EDD, the applicant had to pass an identity verification process with "ID.me" (www.id.me) by submitting the applicant's personal information, a copy of the applicant's driver's license, and a selfie photograph to ID.me for identity verification. Applicants also had to provide their name, Social Security

Number (SSN), and mailing address, among other things, and to self-certify that they met a COVID-19-related reason for being unemployed, partially employed, or unable to work. The EDD relied upon the information in the application to determine UI benefits eligibility. Once an application was approved, the EDD typically distributed state and federal UI benefits electronically to a debit card, which claimants could use to withdraw funds and/or make purchases. These debit cards, which were issued by Bank of America, were sent via the U.S. Postal Service to the address the claimant provided. Claimants could activate their debit card via telephone or online.

From in or around January 2021 through in or around May 2021, the defendant agreed with Zachary Kameron Ramyard and other co-conspirators to verify fraudulent UI claims to the California EDD on behalf of dozens of individuals without their authorization. In order to verify the fraudulent applications with ID.me, the defendant's co-conspirators created counterfeit driver's licenses with victims' PII and the defendant's face on them. In turn, the defendant, in Miami-Dade County, took live selfie photographs of himself to match the counterfeit driver's licenses. He did so by clicking on ID.me links that co-conspirators messaged to a burner phone that the defendant used throughout his involvement in the wire fraud conspiracy. The defendant's live-selfie verifications on ID.me caused the California EDD to accept those fraudulent claims, triggering interstate wires to EDD and causing Bank of America to mail debit cards to Florida and California addresses controlled by the defendant's co-conspirators. Once the defendant's co-conspirators withdrew from the UI debit cards at ATMs, they paid the defendant a small portion of those proceeds via Cash App.

In total, the defendant uploaded live selfie photographs of himself to verify 344 different fraudulent UI claims in 343 different victims' names, the vast majority of which were successful. The defendant's conduct resulted in the California EDD paying out $4,863,694 onto UI debit cards controlled by the defendant's co-conspirators.

The above-detailed facts are corroborated by, among other things, witness interviews, banking records, ID.me records, ATM photographs, business records, and other evidence. The information contained in this proffer is not a complete recitation of the facts and circumstances of this case, but the parties agree it is sufficient to prove beyond a reasonable doubt a violation of 18 U.S.C. § 1349, conspiracy to commit wire fraud.

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

Date: 6/18/25 By: ______________________
JOSEPH EGOZI
ASSISTANT UNITED STATES ATTORNEY

Date: 6/17/2025 By: ______________________
ARTURO A. TAQUECHEL, JR.
ATTORNEY FOR DEFENDANT

Date: 6/17/2025 By: ______________________
ABEL HUMBERTO PERLA BONILLA
DEFENDANT