

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas  
**FILED**

## UNITED STATES DISTRICT COURT

AUG 28 2015

for the

Southern District of Texas

Clerk of Court

United States of America  
 v.  
 Criselda Guadalupe Aldape-Garcia  
 YOB: 1975 Citizenship: United States

Case No.

M-15-1467-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 27, 2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324(a)(1)(A)(ii)

Alien Smuggling

Knowing and in reckless disregard of the fact that Manuel Antonio Lopez-Lopez, Walter Antonio Urias-Martinez and four (4) others, for a total of six (6), who were aliens, who had come to, entered and remained in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law; to wit: transportation by vehicle in Mission, Texas.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

OK to file. TJ

  
 Complainant's signature

David Reese, HSI Special Agent  
 Printed name and title

Sworn to before me and signed in my presence.

Date: 8/28/2015
  
 Judge's signature
City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos  
 Printed name and title

**"ATTACHMENT A"**

I am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On August 27, 2015, Officer Jesus Delgado of Mission Police Department conducted traffic stop on a gray 2008 Land Rover bearing Texas registration BGW6127, at the intersection of Conway Avenue and Military Road.
2. The driver was identified as Criselda Guadalupe Aldape-Garcia and the passenger as Perla Ruby Dominguez.
3. During the traffic stop, Officer Delgado discovered six (6) additional people laying down in the rear of the vehicle.
4. Officer Delgado notified Border Patrol, who responded to the scene and confirmed the six (6) individuals were aliens who did not possess documentation to enter, remain in or pass through the United States. .
5. Aldape-Garcia, Dominguez and the six (6) undocumented aliens (UDA's) were transported to the Border Patrol station in McAllen, Texas for processing.
6. Aldape-Garcia was provided her Miranda warnings by Special Agent David Reese, which she stated she understood and waiving in writing.
7. Post-Miranda, Aldape-Garcia stated she was to be paid an undetermined sum by a male known as "Ricky", to pick up the UDA's near the entrance to Anzalduas Park and transport them to an unknown location. Aldape-Garcia was aware of the UDA's immigration status.
8. Dominguez was provided her Miranda warnings by Special Agent David Reese, which she stated she understood and waiving in writing.
9. Post-Miranda, Dominguez stated she was accompanying Aldape-Garcia to the store, when Aldape-Garcia received a phone call and detoured to the area near Anzalduas Park. Upon arrival, the 6 UDA's entered the vehicle and laid down in the rear. Dominguez stated she was aware of the UDA's immigration status once they entered the vehicle, but did not have prior knowledge of the pickup.
10. Material witness Manuel Antonio Lopez-Lopez stated he crossed the Rio Grande around noon on August 27, 2015. After crossing, he and five (5) other UDA's were led by a guide to an abandoned house near the river. The group remained at the house until a sports utility vehicle, described as either gray or black, arrived and they

entered the vehicle. Lopez-Lopez could not positively identify the driver or passenger.

11. Material witness Walter Antonio Urias-Martinez stated he crossed the Rio Grande shortly before midday with five (5) other UDA's. After crossing, the group remained at an abandoned house near a trash pile until a gray four-door sports utility arrived. Once the group entered the vehicle, three (3) UDA's laid down on the back seat and three (3) UDA's laid down in the rear cargo area. Urias-Martinez could not positively identify the driver or passenger.