

FILED

AO 91 (Rev. 5/85) Criminal Complaint

JAN 17 2023

United States District Court

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MR. [Signature]
DEPUTY CLERK

Western

DISTRICT of

Texas

United States of America
V.Jose Juan Malagon
Maria Teresa Molina Cruz
(Name of Defendant)Criminal Complaint
Case Number: DR23-M-00155,001
002

I, the undersigned complainant being sworn state the following is true and correct to the best of my knowledge and belief. On or about January 13, 2023, in Maverick County, in the Western District of Texas, the defendant(s) did, (Track Statutory Language of Offense)

knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation,

in violation of Title 8 United States Code, Section(s) 1324 (a)(1)(A)(v)(I) and (B)(i).

I further state that I am a(n) Customs & Border Protection Enforcement Officer and that this complaint is based on the following facts:

That at the Camino Real International Port of Entry in Eagle Pass, Texas, on January 13, 2023, the defendants, Jose Juan Malagon and Maria Teresa Molina Cruz, were arrested when it was discovered that they were involved in a scheme to smuggle two illegal aliens from the Republic of Mexico into the United States in violation of law. The defendants attempted to smuggle two minor children, C.A.M.R. and R.A.S.N.R. both citizens and residents of Mexico, into the United States by claiming to Customs and Border Protection Officers that they were both United States citizens. They then presented two valid Texas birth certificates for both children in order to substantiate their claim that they were United States citizens. The defendants were aware that both C.A.M.R. and R.A.S.N.R. were citizens of Mexico who did not own or possess any legal documentation that would allow them to enter, reside, or remain in the United States.

Continued on the attached sheet and made a part hereof:

Yes XX No

Ethelvina I. Felan CBPOE

Signature of Complainant

Sworn to before me and subscribed in my presence,

January 17, 2023

Date

at

Del Rio, Texas

City and State

Collis White U.S. Magistrate Judge

Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer