DJG/2008R01012

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
v.	:	Criminal No. 10-45(SDW)
GASPAR CAMPOS and ANGEL BRAVO	:	8 U.S.C. § 1324 and 18 U.S.C. § 2

SUPERSEDING
INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Conspiracy to Transport Illegal Aliens)

Co-Conspirators and Relevant Entities

1. At all times relevant to this Indictment:

a. Transportes Latinos was a Texas company with its principal place of business located in Houston, Texas. Transportes Latinos was in the business of transporting individuals from Houston, Texas to locations on the eastern seaboard, including New Jersey, for a fee.

b. Defendant GASPAR CAMPOS was a resident of the state of Texas and the owner of Transportes Latinos. Defendant CAMPOS maintained and controlled a business checking account in the name of Transportes Latinos at a Houston, Texas branch of Bank of America (the "BOA Account").

c. Defendant ANGEL BRAVO was a resident of the state of Texas and was employed as the office manager at Transportes Latinos and an authorized signatory on the BOA Account.

d. Hugo Navarrete, who is named as a co-conspirator but not as a defendant herein, resided in Texas. Hugo Navarrete was employed as a van driver by Transportes Latinos.

e. Jose Efrain Fuentes, who is named as a co-conspirator but not as a defendant herein, resided in Texas. Jose Efrain Fuentes was employed as a van driver by Transportes Latinos.

f. Bernardo Fernandez, who is named as a co-conspirator but not as a defendant herein, was a resident of New Jersey. Bernardo Fernandez was employed as a taxi driver who would routinely meet incoming Transportes Latinos vans after the vans entered the state of New Jersey.

g. Nicholas Estrada, who is named as a co-conspirator but not as a defendant herein, was a resident of New York. Nicholas Estrada was employed as a taxi driver who would routinely meet incoming Transportes Latinos vans after the vans entered the state of New Jersey.

2. From in or about January 2008 through on or about December 3, 2008, in the District of New Jersey and elsewhere, defendants

GASPAR CAMPOS and
ANGEL BRAVO

did knowingly and intentionally conspire and agree with each other and others to transport and move aliens within the United States by means of transportation and otherwise, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of law, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Sections 1324 (a)(1)(A)(ii) and (a)(1)(B)(i).

Object of the Conspiracy

3. It was the object of the conspiracy for defendants GASPAR CAMPOS and ANGEL BRAVO to profit from transporting illegal aliens from Houston, Texas to locations on the eastern seaboard, including New Jersey.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendants GASPAR CAMPOS and ANGEL BRAVO arranged for cross-country transportation for illegal aliens for a fee.

5. It was a further part of the conspiracy that defendants GASPAR CAMPOS and ANGEL BRAVO hired van drivers, including Hugo Navarrete, Jose Efrain Fuentes, and other van drivers to drive the illegal aliens from Houston, Texas to various locations, including New Jersey.

6. It was a further part of the conspiracy that defendants GASPAR CAMPOS and ANGEL BRAVO would provide computer-generated Transportes Latinos passenger lists to Hugo Navarrete, Jose Efrain Fuentes, and other van drivers, which fraudulently under-represented the amount that each illegal alien passenger was required to pay to the van driver as a transportation fee.

7. It was a further part of the conspiracy that defendants GASPAR CAMPOS and ANGEL BRAVO hired taxi drivers, including Bernardo Fernandez and Nicholas Estrada, to meet the incoming Transportes Latinos vans and deliver the illegal aliens to locations in New Jersey and New York.

8. It was a further part of the conspiracy that defendant GASPAR CAMPOS would instruct Hugo Navarrete, Jose Efrain Fuentes and others to collect the transportation fee in cash and, in many instances, to deposit the cash into the BOA Account.

9. It was a further part of the conspiracy that defendant GASPAR CAMPOS then used the funds which were deposited into the BOA Account to pay personal expenses, including mortgage payments, credit card payments and home improvements.

10. In furtherance of the conspiracy and to effect its unlawful object, defendants GASPAR CAMPOS and ANGEL BRAVO and their co-conspirators committed and caused to be committed the following acts in the District of New Jersey and elsewhere:

a. In or about January 2008, defendant GASPAR CAMPOS and ANGEL BRAVO agreed to pay Bernardo Fernandez to meet incoming Transportes Latinos vans in New Jersey, and to deliver the illegal aliens to their destinations in his taxi.

b. On or about August 8, 2008, defendant GASPAR CAMPOS agreed in a telephone conversation with an undercover law enforcement officer (the "UC") to provide transportation through Transportes Latinos for an individual purported to be an illegal alien and a relative of the UC.

c. On or about August 19, 2008, defendant GASPAR CAMPOS provided Jose Efrain Fuentes with a Transportes Latinos van containing at least four (4) illegal aliens who were to be transported from Houston, Texas to Queens, New York.

d. On or about August 21, 2008, defendant GASPAR CAMPOS had a telephone conversation with Bernardo Fernandez during which Bernardo Fernandez confirmed that on August 20, 2008, he had deposited the cash received for transporting illegal aliens into the BOA Account.

e. On or about August 21, 2008, defendant GASPAR CAMPOS provided a computer-generated passenger list to Hugo Navarrete which fraudulently under-represented the transportation fee that each of the illegal aliens on the list was to be charged.

f. On or about August 21, 2008, defendant GASPAR CAMPOS provided Hugo Navarrete with a Transportes Latinos van containing at least five (5) illegal aliens who were to be transported from Houston, Texas to various locations, including New Jersey.

g. On or about August 23, 2008, defendant GASPAR CAMPOS had a telephone conversation with Hugo Navarrete during which Hugo Navarrete advised GASPAR CAMPOS that the police had stopped his van and that everyone in the van had been arrested because they were illegal, and GASPAR CAMPOS asked about the whereabouts of the money collected for the trip.

h. Shortly after that telephone call, on or about August 23, 2008, defendant ANGEL BRAVO had a telephone conversation with Hugo Navarrete during which ANGEL BRAVO asked Hugo Navarrete what had happened, and stated he would try to get another van driver to pick Hugo Navarrete up and take him back to Houston, Texas.

I. On or about December 3, 2008, defendant ANGEL BRAVO had a telephone conversation with Nicholas Estrada during which ANGEL BRAVO confirmed that on December 3, 2008 Nicholas Estrada had deposited the cash received for transporting illegal aliens into the BOA Account.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I).

COUNT TWO

(Transporting Illegal Aliens)

1. The allegations in paragraphs 1 and 3 through 10 of Count One are realleged as though fully set forth herein.

2. From on or about August 20, 2008 through on or about August 21, 2008, in the District of New Jersey, and elsewhere, defendants

GASPAR CAMPOS and
ANGEL BRAVO

did knowingly and in reckless disregard of the fact that an alien, namely L.C., had come to, entered, and remained in the United States in violation of law, did transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i) and Title 18, United States Code, Section 2.

COUNT THREE

(Transporting Illegal Aliens)

1. The allegations in paragraphs 1 and 3 through 10 of Count One are realleged as though fully set forth herein.

2. From on or about August 20, 2008 through on or about August 21, 2008, in the District of New Jersey, and elsewhere, defendants

GASPAR CAMPOS and
ANGEL BRAVO

did knowingly and in reckless disregard of the fact that an alien, namely W.D., had come to, entered, and remained in the United States in violation of law, did transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324 (a)(1)(A)(ii) and (a)(1)(B)(i) and Title 18, United States Code, Section 2.

A TRUE BILL

Paul J. Fishman
United States Attorney

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SUPERSEDING INDICTMENT FOR

8 U.S.C. § 1324
and
18 U.S.C. § 2

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