

August 09, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. **L-22-CR-1052**

UNDER SEAL

MGM

1. **ERMINIA SERRANO PIEDRA**
aka IRMA
aka BOSS LADY

2. [REDACTED]
[REDACTED]
[REDACTED]

3. **KEVIN DANIEL NUBER**
aka CAPTAIN

4. **LAURA NUBER**
aka BARBIE

5. [REDACTED]
[REDACTED]

6. **LLOYD BEXLEY**

7. **JEREMY DICKENS**

8. [REDACTED]
[REDACTED]

9. [REDACTED]

10. **KATIE ANN GARCIA**
aka GUERA

11. [REDACTED]
[REDACTED]
[REDACTED]

12. **OLIVERIA PIEDRA CAMPUZANO**

13. [REDACTED]
[REDACTED]

14. PEDRO HAIRO ABRIGO

§
§
§

INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction

1. From on or about November 2018 and continuing through the date of the indictment, the defendants ERMINIA SERRANO PIEDRA, [REDACTED], PEDRO HAIRO ABRIGO, KEVIN DANIEL NUBER, LAURA NUBER, [REDACTED], [REDACTED], LLOYD BEXLEY, JEREMY DICKENS, [REDACTED], [REDACTED], KATIE ANN GARCIA, [REDACTED], OLIVERIA PIEDRA CAMPUZANO, and [REDACTED], together with others, operated and were members of a human smuggling organization (hereinafter referred to as the HSO). The purpose of the HSO was to facilitate the unlawful transportation and movement of at least hundreds of undocumented aliens within the United States, to harbor and conceal the aliens from detection by law enforcement authorities, and to profit from the proceeds of the unlawful smuggling activity. The aliens were citizens of Mexico, Guatemala, and Colombia, and did not have prior official authorization from the United States government to come to, enter, and reside in the United States. The aliens or their families paid a fee to the HSO to help them travel illegally to and within the United States. Members of the HSO commonly referred to aliens as “boxes” or “packages.”

2. To accomplish its goals, the HSO used drivers to pick up aliens near the U.S.-Mexico border and transport them to residences commonly referred to as “stash houses,” which were in or around Laredo, Texas, and elsewhere. After housing aliens at stash houses, the HSO used

drivers to transport and move aliens to other locations further into the interior of the United States, such as San Antonio, Texas.

3. Defendant ERMINIA SERRANO PIEDRA directed operations of the HSO, recruited members of the HSO, directed payment to members of the HSO, and directed members of the HSO to be lookouts for law enforcement. [REDACTED] coordinated the smuggling of aliens and movement of financial proceeds of the HSO.

4. Defendants KEVIN DANIEL NUBER, LAURA NUBER, KATIE ANN GARCIA, [REDACTED], [REDACTED], and OLIVERIA PIEDRA CAMPUZANO were responsible for obtaining and supervising stash houses in the Laredo and Austin areas on behalf of the HSO, including renting properties, paying utilities, providing food to aliens, and coordinating the movement of aliens to and from the stash houses.

5. Defendant PEDRO HAIRO ABRIGO facilitated the HSO's operations by paying utilities for stash houses used by the HSO and registering vehicles used by the HSO to smuggle aliens.

6. Defendant [REDACTED] coordinated the transport of groups of aliens for the HSO and procured vehicles and warehouses to facilitate the HSO's smuggling efforts.

Defendants KEVIN DANIEL NUBER, LLOYD BEXLEY, JEREMY DICKENS, [REDACTED], [REDACTED], and [REDACTED] all acted as drivers on behalf of the HSO. HSO drivers used various methods to transport aliens, including hiding them in suitcases placed in pickup trucks; transporting aliens in the back of tractor-trailers; transporting and concealing aliens in covered beds of pick-up truck beds; concealing aliens in empty water tankers; and putting aliens in empty boxes that were strapped to flatbed trailers. The methods used by the

HSO to transport and move aliens placed the aliens in danger, as they were frequently held in contained spaces with little ventilation, which became overheated, and they were driven at high speeds with no vehicle safety devices. HSO drivers were paid in amounts up to \$2,500 for each alien they transported.

COUNT ONE

(Conspiracy to Transport and Move an Alien, Placing in Jeopardy the Life of Any Person)
8 U.S.C. §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

From in or about November 2018 to the present, in the Southern District of Texas and elsewhere, defendants

ERMINIA SERRANO PIEDRA
aka IRMA
aka BOSS LADY

[REDACTED]

KEVIN DANIEL NUBER
aka CAPTAIN

LAURA NUBER
aka BARBIE

[REDACTED]

LLOYD BEXLEY

JEREMY DICKENS

[REDACTED]

[REDACTED]

**KATIE ANN GARCIA
aka GUERA**

OLIVERIA PIEDRA CAMPUZANO

and

PEDRO HAIRO ABRIGO

knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with each other and other persons known and unknown to the Grand Jury, to transport and move and attempt to transport and move within the United States by means of transportation and otherwise such alien in furtherance of such violation. This violation placed in jeopardy the life of any person.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii).

COUNT TWO

(Transporting and Moving an Alien for the Purpose of Commercial Advantage or Private Financial Gain, Placing in Jeopardy the Life of Any Person)

8 U.S.C. §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

On or about November 17, 2021, in the Southern District of Texas and elsewhere, defendants

ERMINIA SERRANO PIEDRA
aka IRMA
aka BOSS LADY

and

[REDACTED]

and others known and unknown to the Grand Jury, aiding and abetting each other, knowing and in reckless disregard of the fact that E. L.-N. was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to 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. This violation placed in jeopardy the life of any person.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii).

COUNT THREE

(Transporting and Moving an Alien for the Purpose of Commercial Advantage or Private Financial Gain)

8 U.S.C. §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

On or about December 18, 2021, in the Southern District of Texas, defendants

ERMINIA SERRANO PIEDRA
aka IRMA
aka BOSS LADY

[REDACTED]

LLOYD BEXLEY

and

[REDACTED]

and others known and unknown to the Grand Jury, aiding and abetting each other, knowing and in reckless disregard of the fact that C. H.-T. was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to 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), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT FOUR

(Conspiracy to Conceal, Harbor, or Shield from Detection an Alien for the Purpose of Commercial Advantage or Private Financial Gain)

8 U.S.C. §§ 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

From in or about November 2018 to the present, in the Southern District of Texas and elsewhere, defendants

ERMINIA SERRANO PIEDRA
aka IRMA
aka BOSS LADY

[REDACTED]

KEVIN DANIEL NUBER
aka CAPTAIN

LAURA NUBER
aka BARBIE

[REDACTED]
KATIE ANN GARCIA
aka GUERA

[REDACTED]
OLIVERIA PIEDRA CAMPUZANO

[REDACTED]
and

PEDRO HAIRO ABRIGO

knowing and in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jury, to conceal, harbor, and shield from detection, and attempt to conceal, harbor, and shield from detection, such alien in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

COUNT FIVE

(Concealing, Harboring, or Shielding from Detection an Alien for the Purpose of Commercial Advantage or Private Financial Gain)

8 U.S.C. §§ 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

On or about December 20, 2021, in the Southern District of Texas and elsewhere,
defendants

ERMINIA SERRANO PIEDRA
aka IRMA
aka BOSS LADY

KEVIN DANIEL NUBER
aka CAPTAIN

and

LAURA NUBER
aka BARBIE

and others known and unknown to the Grand Jury, aiding and abetting each other, knowing and in reckless disregard of the fact that M. C.-Z. was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection, and attempt to conceal, harbor, or shield from detection, such alien in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

COUNT SIX

(Concealing, Harboring, or Shielding from Detection an Alien for the Purpose of Commercial Advantage or Private Financial Gain)

8 U.S.C. §§ 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i)

Paragraphs 1 through 6 of this Indictment are realleged and incorporated as though fully set forth herein.

On or about November 25, 2021, in the Southern District of Texas and elsewhere,
defendant

KATIE ANN GARCIA
aka GUERA

and



and others known and unknown to the Grand Jury, aiding and abetting each other, knowing and in reckless disregard of the fact that V. L.-B. was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection, and attempt to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

NOTICE OF CRIMINAL FORFEITURE

(18 U.S.C. § 982 and 8 U.S.C. § 1324)

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Title 8, United States Code, Section 1324(b), Title 18, United States Code, Section 982, and Title 28 United States Code, Section 2461(c), the United States gives notice to the Defendants

ERMINIA SERRANO PIEDRA



PEDRO HAIRO ABRIGO

OLIVERIA PIEDRA CAMPUZANO

KEVIN DANIEL NUBER

LAURA NUBER



LLOYD BEXLEY

JEREMY DICKENS



Counts 1, 2, 3, 4, 5

Counts 1, 4

Counts 1, 4

Counts 1, 4

Counts 1, 4, 5

Counts 1, 4, 5

Counts 1, 2, 3, 4

Counts 1, 3

Count 1

Count 1

[REDACTED]
KATIE ANN GARCIA
[REDACTED]
[REDACTED]

Count 1
Counts 1, 4, 6
Counts 1, 4, 6
Counts 1, 3, 4

that upon conviction of the offense of alien smuggling as charged in Counts 1-6 of the Indictment, the Defendants shall forfeit to the United States a) any conveyance used in the commission of the offenses, pursuant to Title 18, United States Code, Section 982(a)(6)(A)(i); b) any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses, and any property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of the offenses, pursuant to Title 18, United States Code, Section 982(a)(6)(A)(ii); and c) any conveyance that has been or is being used in the commission of the offenses, the gross proceeds of such violations, and any property traceable to such conveyances or proceeds, pursuant to Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c), including the following property:

- a) United States currency money judgment of forfeiture against the following Defendants in the amount equal to the value of any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from these offenses, and the gross proceeds of these offenses, and any property traceable to such proceeds, specifically for the sums:

ERMINIA SERRANO PIEDRA	\$871,250.84
[REDACTED]	\$281,935.00
PEDRO HAIRO ABRIGO	\$745,966.56
KEVIN DANIEL NUBER	\$400,000.00

- b) The real property and improvements located at 662 Highway 95 S Elgin, Texas 78621 and legally described as:

BEING A 12.045 ACRE TRACT OR PARCEL OF LAND OUT OF AND BEING A PART OF THE GEORGE H. STOVALL SURVEY, A-303, IN BASTROP COUNTY, TEXAS, AND BEING A PART OF THAT CERTAIN 67.147 ACRE TRACT DESCRIBED IN A RECEIVERS DEED FROM SARAH WANNARKA, RECEIVER OF CAUSE NO. 23,335,335TH JUDICIAL DISTRICT COURT OF BASTROP COUNTY, TO DAVID FENSKE, RECORDED IN VOL. 1203, PAGE 328, BASTROP COUNTY OFFICIAL PUBLIC RECORDS.

- c) The real property and improvements located at **621 at Old Sayers Rd, Elgin, TX** and legally described as:

TRACT ONE: 10 ACRES, MORE OR LESS, OUT OF AND BEING A PART OF THE GEORGE II. STOVALL SURVEY, ABSTRACT NO. 303, BASTROP COUNTY, TEXAS. TRACT TWO: 52.687 ACRES OF LAND, MORE OR LESS, OUT OF AND BEING A PART OF THE GEORGE H. STOVALL SURVEY, ABSTRACT NO. 303, BASTROP COUNTY, TEXAS. TRACT THREE: 0.93 ACRES OF LAND, MORE OR LESS, OUT OF THE A.P. NANCE SURVEY, ABSTRACT NO. 459, BASTROP COUNTY, TEXAS.

- d) the real property and improvements located at **111 Laurel Oaks, Bastrop, TX** and legally described as:

BEING 1.240 ACRES OF LAND OUT OF LOT 2, LAKE BASTROP ESTATES PLACE THREE, A SUBDIVISION IN BASTROP COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT RECORDED IN PLAT CABINET 1, PAGE 51A, PLAT RECORDS OF BASTROP COUNTY, TEXAS.

SUBSTITUTE ASSETS

In the event that the property that is subject to forfeiture pursuant to Title 18, United States Code, Section 982, and Title 8, United States Code, Section 1324 and as a result of any act or omission of the defendants:

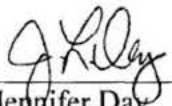
Or

- a) cannot be located upon the exercise of due diligence;
- b) has been placed beyond the jurisdiction of the Court;
- c) has been transferred or sold to, or deposited with a third party;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States to seek forfeiture of any other property of the Defendants up to the value of such property, pursuant to Title 8, United States Code, Section 1324 and Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), and Title 28 United States Code, Section 2461(c).

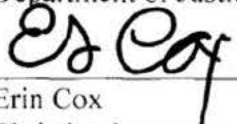
ORIGINAL SIGNATURE ON FILE

JENNIFER B. LOWERY
UNITED STATES ATTORNEY



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