

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA )  
 ) No. \_\_\_\_\_  
 vs. ) Violations: Title 8, United States  
 ) Code, Sections 1324(a)(2)(B)(ii) and  
 ) (iii); 1324(a)(1)(A)(i) and  
 LUIS ALFREDO DELACRUZ ) 1324(a)(1)(B)(i); 1324(a)(1)(A)(ii) and  
 ) 1324(a)(1)(B)(i); 1324(a)(1)(A)(iii) and  
 ) 1324(a)(1)(B)(i)

**COUNT ONE**

The MAY 2018 GRAND JURY charges:

On or about April 3, 2016, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, knowing and in reckless disregard of the fact that an alien, namely, Individual A, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, for the purpose of commercial advantage and private financial gain, and did not upon arrival immediately bring and present said alien to an appropriate immigration officer at a designated port of entry;

in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and (iii) and Title 18, United States Code, Section 2.

**COUNT TWO**

The MAY 2018 GRAND JURY further charges:

On or about November 1, 2015, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, knowing and in reckless disregard of the fact that an alien, namely, Individual B, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, for the purpose of commercial advantage and private financial gain, and did not upon arrival immediately bring and present said alien to an appropriate immigration officer at a designated port of entry;

in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and (iii) and Title 18, United States Code, Section 2.

**COUNT THREE**

The MAY 2018 GRAND JURY further charges:

On or about April 3, 2016, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly bring to the United States an alien, namely Individual A, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security;

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

**COUNT FOUR**

The MAY 2018 GRAND JURY further charges:

On or about November 1, 2015, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly bring to the United States an alien, namely Individual B, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security;

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

**COUNT FIVE**

The MAY 2018 GRAND JURY further charges:

On or about April 3, 2016, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that a certain alien, Individual A, had come to, entered and remained in the United States in violation of law, did transport and move said 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, Section 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

**COUNT SIX**

The MAY 2018 GRAND JURY further charges:

On or about November 1, 2015, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that a certain alien, Individual B, had come to, entered and remained in the United States in violation of law, did transport and move said 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, Section 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

**COUNT SEVEN**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual B had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual B from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT EIGHT**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual C had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual C from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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



**COUNT NINE**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual D had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual D from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT TEN**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual E had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual E from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT ELEVEN**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual F had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual F from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT TWELVE**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual G had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual G from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT THIRTEEN**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual H had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield Individual H from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

**COUNT FOURTEEN**

The MAY 2018 GRAND JURY further charges:

On or about June 1, 2018, in Cortland, in the Northern District of Illinois, Western Division and elsewhere,

LUIS ALFREDO DELACRUZ,

defendant herein, did knowingly and in reckless disregard of the fact that Individual I had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield I from detection in buildings and other places and through employment by Alfredo's Iron Works, for the purpose of commercial advantage and private financial gain;

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

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY