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Case 2:25-cr-00294-MIS

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Document 18-1 (Ex Parte) Filed 02/21/25 1 of 8 STRICT COURT IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO UNITED STATES OF AMERICA. CRIMINAL NO. 25-294 MIS Plaintiff. 8 U.S.C. § 1324(a)(1)(A)(v)(I): VS. Conspiracy to Transport, Harbor, and JORGE ALBERTO DE LA CRUZ-Bring in Illegal Aliens. DOMINGUEZ, a.k.a. "Guero," JORGE VALDEZ-CHINA, a.k.a. "Lolo," EDNA VALDEZ-CHINA, MELISSA VARGAS, MICHELLE MARTINEZ, ABEL AGUILAR-CANO. JONATHAN VALDEZ-CHINA, a.k.a. "China," a.k.a. "Dior," LESLIE NICOLE CALVILLO, a.k.a. Leslie Jaramillo, ALMA GUADALUPE VALDEZ-CHINA,

Defendants.

JESUS CALVILLO, a.k.a. "Chuy,"

INDICTMENT

The Grand Jury charges:

JORGE CALVILLO, JOSE PALOMINO,

From on or about November 1, 2023, and continuing to on or about February 19, 2025, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, JORGE ALBERTO DE LA CRUZ-DOMINGUEZ, a.k.a. "Guero," JORGE VALDEZ-CHINA, a.k.a. "Lolo,", EDNA VALDEZ-CHINA, MELISSA VARGAS, MICHELLE MARTINEZ, ABEL AGUILAR-CANO, JONATHAN VALDEZ-CHINA, a.k.a. "China," a.k.a. "Dior." LESLIE NICOLE CALVILLO, a.k.a. Leslie Jaramillo, ALMA GUADALUPE VALDEZ-

CHINA, JESUS CALVILLO, a.k.a. "Chuy," JORGE CALVILLO, JOSE PALOMINO,

unlawfully, knowingly, and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 8 U.S.C. § 1324(a)(1)(A)(ii), specifically, transporting, harboring, and bringing into the United States illegal aliens.

Overt Acts

In furtherance of the conspiracy, and to affect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

Overt Act One

Starting in November 2023, Jorge Alberto De La Cruz-Dominguez hired Co-Conspirator 1 to pick up groups of undocumented aliens in New Mexico and transport them to Albuquerque, New Mexico, in exchange for money.

Overt Act Two

On February 6, 2024, Jorge Alberto De La Cruz-Dominguez hired Co-Conspirator 1 to take seven undocumented aliens to Albuquerque, New Mexico, and, during the course of the smuggling event, Co-Conspirator 1 fled the Border Patrol Checkpoint on I-25 at a high rate of speed.

Overt Act Three

On February 21, 2024, Jorge Alberto De La Cruz-Dominguez and Jorge Valdez-China hired Co-Conspirator 1 to transport undocumented aliens to Albuquerque, New Mexico.

Overt Act Four

On February 21, 2024, Jorge Valdez-China gave Co-Conspirator 1 location information on where to pick up the undocumented aliens in El Paso, Texas, and, during the course of the

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smuggling event, Co-Conspirator 1 fled from Texas Department of Public Safety into New Mexico.

Overt Act Five

On April 14, 2024, Co-Conspirator 9 transported undocumented aliens in and around Butterfield, Texas, and, during the smuggling event, Co-Conspirator 9 instructed the undocumented aliens to flee from Border Patrol by jumping and running from the moving vehicle.

Overt Act Six

On April 14, 2024, after Co-Conspirator 9 fled from Border Patrol at a high rate of speed. Jorge Valdez-China messaged an undercover agent regarding two undocumented aliens that fled into the desert after Border Patrol attempted to apprehend them.

Overt Act Seven

On Apirl 14, 2024, Jorge Valdez-China attempted to recover the undocumented aliens who had fled into the desert in order to assist their transportation further into the United States.

Overt Act Eight

On May 14, 2024, Jorge Alberto De La Cruz-Dominguez hired Co-Conspirator 1 to

transport six undocumented aliens from Las Cruces, New Mexico, to Albuquerque, New Mexico.

Overt Act Nine

On May 14, 2024, Jorge Alberto De La Cruz-Dominguez instructed Co-Conspirator 1 to utilize a dirt road to circumvent the Border Patrol Checkpoint.

Overt Act Ten

In July 2024, Jorge Valdez-China coordinated with Co-Conspirator 2 to transport undocumented aliens from a stash house in El Paso, Texas, to Albuquerque, New Mexico.

Overt Act Eleven

Between July 2024 and October 28, 2024, Jorge Valdez-China coordinated approximately twenty smuggling events, during which Co-Conspirator 2 would pick up undocumented aliens from the United States/Mexico International Boundary near Santa Teresa, New Mexico, and deliver said aliens to a stash house in El Paso, Texas.

Overt Act Twelve

Between July 2024 and October 28, 2024, Jorge Valdez-China and Abel Aguilar-Cano directed Co-Conspirator 2 to transport approximately 100 undocumented aliens to Albuquerque, New Mexico.

Overt Act Thirteen

Between July 2024 and October 28, 2024, Jesus Calvillo housed undocumented aliens for the HSO at a stash house in El Paso, Texas.

Overt Act Fourteen

On July 10, 2024, Edna Valdez-China sent a message to Melissa Vargas requesting Jorge Valdez-China to come move the "cajas," which is slang for aliens because her apartment was supposed to be fumigated.

Overt Act Fifteen

Between July 2024 and October 28, 2024, Edna Valdez-China housed undocumented aliens with her at a stash house El Paso, Texas, and provided them with food.

Overt Act Sixteen

On August 12, 2024, Jorge Alberto De La Cruz-Dominguez organized and directed the bringing in of thirteen undocumented aliens from Ciudad Juarez, Mexico, through the desert near Santa Teresa, New Mexico.

Overt Act Seventeen

On August 12, 2024, Co-Conspirators 3 and 4 gave each undocumented alien a liter of water and a Gatorade for the walk through the desert.

Overt Act Eighteen

On August 12, 2024, Jorge Alberto De La Cruz-Dominguez instructed the undocumented aliens to cross the United States/Mexico International Boundary fence into the United States.

Overt Act Nineteen

On August 12, 2024, Jorge Alberto De La Cruz-Dominguez instructed the undocumented aliens on where to meet Co-Conspirator 5 to be transported further into the United States.

Overt Act Twenty

On August 12, 2024, after an undocumented alien died from heat exposure, Jorge Alberto De La Cruz-Dominguez instructed the group of undocumented aliens to leave the victim in the desert near Santa Teresa, New Mexico.

Overt Act Twenty-One

On September 5, 2024, Jorge Valdez-China coordinated with Co-Conspirator 2 to transport approximately seventeen undocumented aliens, including two unaccompanied female minors under the age of 10, from the United States/Mexico International Boundary near Santa Teresa, New Mexico, to a stash house in El Paso, Texas.

Overt Act Twenty-Two

On September 5, 2024, Jorge Valdez-China and Abel Aguilar-Cano coordinated the transportation of seventeen undocumented aliens, including the two unaccompanied minors, from El Paso, Texas, to Albuquerque, New Mexico.

Overt Act Twenty-Three

On or about September 5, 2024, Abel Aguilar-Cano coordinated with Co-Conspirator 2 to transport the two undocumented minors from Albuquerque, New Mexico, to Virginia.

Overt Act Twenty-Four

On September 15, 2024, Leslie Nicole Calvillo met with Alma Guadalupe Valdez-China in Mexico for Leslie Nicole Calvillo to bring into the United States from Mexico \$5,000 in U.S. Currency, representing human smuggling proceeds.

Overt Act Twenty-Five

On September 16, 2024, Alma Guadalupe Valdez-China organized for Co-Conspirator 6 and M.J. to illegally enter the United States from Mexico.

Overt Act Twenty-Six

On September 16, 2024, Jorge Valdez-China and Alma Guadalupe Valdez-China hired and directed Co-Conspirator 6 to take care of the undocumented aliens concealed at Jorge Valdez-China's stash house in El Paso, Texas.

Overt Act Twenty-Seven

Between September 16, 2024, and October 28, 2024, Jorge Alberto De La Cruz-

Dominguez and Jonathan Valdez-China organized and directed the transportation of dozens of undocumented aliens from the United States/Mexico International Boundary near Santa Teresa, New Mexico, to a stash house in El Paso, Texas.

Overt Act Twenty-Eight

Between September 16, 2024, and October 28, 2024, Jorge Alberto De La Cruz-Dominguez, Jorge Valdez-China, Jonathan Valdez-China, and Abel Aguilar-Cano coordinated with Co-Conspirator 6 to transport thirty-five undocumented aliens from El Paso, Texas, to Albuquerque, New Mexico.

Overt Act Twenty-Nine

On September 16, 2024, picked up nine undocumented aliens, including M.J., from Jorge Valdez-China's stash house in El Paso, Texas, and transported them to Albuquerque, New Mexico.

Overt Act Thirty

On October 28, 2024, Jorge Valdez-China coordinated with and directed Co-Conspirators 2, 6, and 7 to transport seventeen undocumented aliens from El Paso, Texas, to Albuquerque, New Mexico.

Overt Act Thirty-One

Betweeen September 16, 2024, and October 28, 2024, Jorge Calvillo and Jose Palomino loaded undocumented aliens into vehicles at the stash house in El Paso, Texas, for their transport to Albuquerque, New Mexico.

Overt Act Thirty-Two

On October 30, 2024, Leslie Nicole Calvillo attempted to bring in approximately \$4,000 in U.S. Currency of alien smuggling proceeds through the Paso Del Norte Port of Entry in El Paso, Texas.

Overt Act Thirty-Three

On December 5, 2024, Michelle Martinez and Melissa Vargas attempted to bring in approximately \$5,000 in U.S. Currency of alien smuggling proceeds through the Paso Del Norte Port of Entry in El Paso, Texas.

Overt Act Thirty-Four

On January 29, 2025, Jorge Valdez-China met with an undercover agent to return passports of undocumented aliens that Jorge Valdez-China and other co-conspirators had smuggled further into the United States.

Overt Act Thirty-Five

On January 29, 2025, Jorge Valdez-China offered an undercover agent a job to transport undocumented aliens to Albuquerque. New Mexico, for \$300 to \$800 per alien.

Overt Act Thirty-Six

On February 6, 2025. I Jorge Valdez-China contacted an

undercover agent to pick up eight undocumented aliens stranded near Pinon, New Mexico, and transport them to Albuquerque, New Mexico.

Overt Act Thirty-Seven

On February 6, 2025, Co-Conspirator 8 picked up four of the eight undocumented aliens from Pinon. New Mexico.

Overt Act Thirty-Eight

On February 6, 2025, Jorge Valdez-China requested the undercover agent to pick up four of the eight undocumented aliens left near Pinon, New Mexico, and take them to Albuquerque. New Mexico.

In violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I).

A TRUE BILL:

Assistant United States Attorney District of New Mexico

That Attorney Human Rights and Special Prosecutions Section Criminal Division, U.S. Department of Justice

RLC

/s/ FOREPERSON OF THE GRAND JURY