

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Sealed Under Seal
JUL 20 2018
David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

ROBERT JOHN HALL, JR.

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CR. NO.: 18-cr-

UNDER SEAL

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

INTRODUCTION

1. United States Department of Homeland Security ("DHS") is a cabinet department of the United States government. Among its many responsibilities are securing and managing the nation's borders, preventing terrorism, and enhancing security.

2. United States Customs and Border Protection ("CBP") is the largest law enforcement agency of DHS. Its primary mission is to safeguard the United States' borders by, among other things, enforcing federal immigration and drug laws.

3. Defendant ROBERT JOHN HALL JR. was a CBP Border Patrol Agent ("BPA") from January 2001 to September 2017. During that time, he worked at Border Patrol Stations located within the Southern District of Texas. As a BPA, HALL's official duties included preventing the illegal trafficking of drugs and contraband into the United States.

4. In approximately 2004, Hall was introduced to individuals associated with a drug trafficking organization ("DTO"). HALL agreed to assist the DTO in smuggling illegal narcotics into the United States.

5. From 2004 to 2014, HALL facilitated the DTO's trafficking of illegal narcotics into the United States from Mexico. In exchange for money, HALL, working with others,

provided the DTO with CBP sensor locations, the locations of unpatrolled roads at or near the countries' border, the number of BPAs working in a certain area, keys to unlock CBP locks located on fences along the border, and CBP radios. HALL also diverted BPAs from the smuggling routes used by the DTO in order to provide a window to transport the drug shipments across the border.

6. HALL had access to these materials and the information by virtue of his position as a BPA.

7. HALL accepted over \$50,000 in cash bribes from the DTO in exchange for his assistance in smuggling illegal narcotics into the United States.

COUNT ONE
18 U.S.C. § 201 (Bribery)

The allegations contained in paragraphs 1 through 7 of this Information are re-alleged and incorporated by reference as though fully set forth herein.

On or about October 30, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT JOHN HALL, JR.,

a public official, that is, a Border Patrol Agent with the Department of Homeland Security, Customs and Border Protection, directly and indirectly did corruptly receive, accept, and agree to receive and accept personally something of value, that is a cash payment, in return for being induced to do an act in violation of his official duty; namely, providing assistance to smuggle marijuana and other illegal narcotics into the United States of America.

In violation of Title 18, United States Code, Section 201(b)(2).

NOTICE OF CRIMINAL FORFEITURE
18 U.S.C. § 981(a)(1)(C); 28 U.S.C. §2461(c)

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to the defendant,

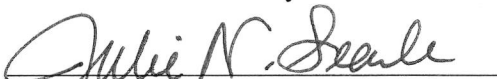
ROBERT JOHN HALL, JR.,

that in the event of conviction, all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses is subject to forfeiture.

The United States will seek the imposition of a money judgment. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the amount of the money judgment.

RYAN PATRICK
United States Attorney

By:


Julie N. Searle
Assistant United States Attorney
Southern District of Texas

ANNALOU TIROL
Acting Chief, Public Integrity Section

By:

/s/ _____
Rebecca Moses
Peter M. Nothstein
Trial Attorneys
United States Department of Justice
Public Integrity Section