

AO 91 (Rev. 9/01) Criminal Complaint

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES DISTRICT COURT

for the
District of New Mexico

11 MAY 16 AM 9:59

CLERK-LAS CRUCES

UNITED STATES OF AMERICA)

v.)

Crystal Pierro)

Case No. MJ 11-1288)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief that,

On or about the date of 05/15/2011 in the county of Luna in the State and District of
New Mexico, the defendant violated, 21 U.S.C. § 841 & 846, an offense described as follows:

unlawfully, knowingly and intentionally possess with intent to distribute 24 Pounds (11 kilograms), of
Marijuana a Schedule 1 controlled substance; and did unlawfully, knowingly and intentionally combine, conspire and
confederate and agree with one another (and with other persons) to possess with intent to distribute the same:

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

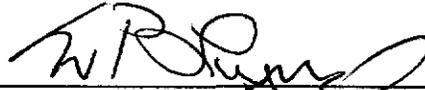
Carlos Martos

Special Agent

Printed name and title

Sworn to before me and subscribed in my presence,

Date: 05/16/2011



Judge's signature

City and state: Las Cruces, New Mexico

United States Magistrate Judge

Printed name and title

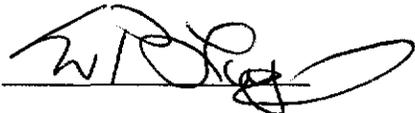
United States of America

V.
Crystal Pierro

On May 15, 2011 at approximately 2148 hrs, a white-in-color Chevrolet minivan with one female occupant, later identified as Crystal PIERRO, attempted to make entry into the United States through the Columbus, New Mexico Port of Entry (POE). The Customs and Border Protection Officer (CBPO) that encountered PIERRO noticed that she was extremely nervous and asked her what her purpose of visiting Mexico was. PIERRO stated she went to go visit her boyfriend. Another CBPO, along with his trained K-9 partner, began inspecting the vehicle. The CBPO's K-9 partner positively alerted to the presence of narcotics in the minivan that PIERRO was driving.

PIERRO was sent to secondary inspection for further questioning and examination of her vehicle. During the examination, CBPO's noticed that the entire front dashboard assembly had been previously removed and was still not completely reinstalled. This area is also the same area to which the K-9 had alerted to earlier. CBPO's began to remove the dashboard assembly when they discovered what appeared to be a hidden compartment. Upon opening this compartment, they discovered numerous small brick-size packages that were wrapped in black plastic. The packages and how they were wrapped is consistent with those used by local Drug Trafficking Organizations (DTO) who try to smuggle narcotics into the United States from Palomas, Chihuahua, Mexico. The CBPO's then proceeded to tear into one of the packages and noticed that it contained a green leafy substance consistent with that of marijuana. The substance was field tested and the results were positive for marijuana. A total of 23 packages were found in the dashboard assembly and weighed a combined total of 24 pounds (11 kilograms).

Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) Special Agents (S/A) were notified by the CBPO's from the Columbus, NM POE that they had apprehended PIERRO in a vehicle that contained 24 lbs of marijuana. HSI Agents responded to interview PIERRO. HSI Agents read PIERRO her Miranda rights. PIERRO declined to speak with HSI Agents. PIERRO was transported to the Deming, NM ICE Office for processing and then to the Luna County Detention Center. Assistant United States Attorney John Crews was advised and authorized federal prosecution for PIERRO.



United States Magistrate Judge
05/16/2011



Carlos Martos
Special Agent
05/16/2011