

AO 91 (Rev. 11/11) Criminal Complaint

DOA: 01/26/2026

UNITED STATES DISTRICT COURT

for the
District of Arizona

United States of America
v.
Ludwin Benjamin Perez Velasco,
a.k.a. Jared Jimenez Corona
a.k.a. Jared Emmanuel Jimenez

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Case No.

25-3016MJ

*Defendant***CRIMINAL COMPLAINT**

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

COUNT ONE

On or about April 7, 2022, in Maricopa County, in the District of Arizona, the defendant, LUDWIN BENJAMIN PEREZ VELASCO, did knowingly make false attestations, that is, statements that he is a United States Citizen and that his name is "JARED JIMENEZ CORONA," on an employment eligibility Form I-9, Employment Eligibility Verification, for the purpose of satisfying a requirement of section 274A(b) of the Immigration and Nationality Act.

In violation of Title 18, United States Code, Section 1546(b)(3).

This criminal complaint is based on these facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein

AUTHORIZED BY: AUSA Bradley Baugher

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BAUGHER
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☒ Continued on the attached sheet.NIZA-RENEE
ZAMUDIO

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ZAMUDIO
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Complainant's signature

Niza Zamudio
HSI Special Agent

Printed name and title

Sworn to telephonically.

Date:

Jan. 28, 2026

M Morrissey

Judge's signature

City and state: Phoenix, Arizona

United States Magistrate Judge

Printed name and title

STATEMENT OF PROBABLE CAUSE

I, Special Agent Niza Zamudio, declare under penalty of perjury that the following is true and correct.

1. I am a Special Agent with Homeland Security Investigations (HSI). I have learned the facts recited herein from direct participation in the investigation and from the reports and communications of other agents and officers.

a. ZIPPS INVESTIGATION

2. In February 2025, HSI Phoenix Special Agents received a tip alleging that Zipps Sports Grill's fourteen restaurant locations in Arizona are employing illegal aliens to staff their kitchens. The reporting party indicated that management is aware these employees are using fraudulent identification documents to verify their eligibility to work, via the E-Verify web-based system.
3. In March 2025, HSI personnel served all 14 Zipps Restaurant locations, including their corporate headquarters, with a Notice of Inspection (NOI) requiring the company to produce their Forms I-9. The following week, HSI personnel received compliance documents from Zipps, including a list that alleged to contain the original Forms I-9 for all current and former employees within the past two years. The compliance from Zipps did not include any photocopies of supporting documentation used by prospective employees during the hiring process.
4. HSI personnel reviewed the employment documents provided by Zipps pursuant to the NOI, which identified a list of current and former employees. Analysis of the records

revealed multiple instances in which the name, social security number (SSN), and date of birth on a Form I-9 were being misused to gain employment.

5. A request was made to the Arizona Department of Economic Security (DES) to provide 2024 and 2025 wage reports for each SSN identified during the NOI. DES reported wages are tracked by the individual SSN. The social security numbers listed on the employee Forms I-9 were queried in the DES database. DES results revealed the employers that paid wages to each SSN during quarter 2 (April, May and June) of 2025.
6. The review identified seventy-six (76) employees that had three (3) to forty-two (42) active employers other than Zipps Sports Grill in quarter 2 of 2025. These 76 individuals certified themselves as United States citizens, which means that they were not required to list an alien registration number on their Forms I-9.
7. The DES reports showed multiple jobs and extremely high wages earned in the same quarter, which is consistent with aggravated identity fraud. This pattern is consistent among all the individuals who completed their paperwork in the same manner. Consequently, investigators were unable to identify the true names of these individuals based solely on the DES data, because these individuals are presumably using someone else's identity documents.

b. IDENTIFICATION OF JARED JIMENEZ CORONA

8. During the course of the investigation, DES records were reviewed for Zipps employee JARED JIMENEZ CORONA (CORONA) using Social Security number ending in XXX-XX-7243. On January 27th, 2026, your affiant reviewed the DES records for CORONA. Records checks showed that CORONA received income from 17 different

employers during Q1 2024-Q2 2025, including other local restaurants, construction companies, an electrical company, and a golf club.

9. A Verification Form I-9 contains two sections. Section 1 contains the “Employee Information and Attestation” for the employee to fill out, sign and date. A review of a Form I-9 produced by Zipps pursuant to the NOI in March 2025 revealed the following: Section 1 of the Verification Form I-9 for employee “JARED JIMENEZ CORONA” contains a “checkmark” next to the box stating that the employee is a citizen of the United States. It further contains a provision in bold stating, *“I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.”* Underneath that attestation is a box for the signature of the employee which contains the printed name “JARED EMMANUEL JIMENEZ,” with a signature date of April 7th, 2022. Section 2 of the Form I-9 was completed on April 7th, 2022 by employer authorized representative “Jeff Forrest.” The E-Verify verification was completed on April 8th, 2022, and lists the first date of employment as April 7th, 2022.

c. IDENTIFICATION OF LUDWIN BENJAMIN PEREZ VELASCO

10. On January 23, 2026, United States Magistrate Judge Deborah M. Fine approved and signed a search warrant for Zipps Sports Grill Kierland, located at 6501 E. Greenway Parkway, Scottsdale, AZ 85254. On January 26, 2026, at approximately 4:16 p.m., law enforcement personnel executed the federal search warrant on the subject premises.

During the execution of the search warrant, law enforcement personnel encountered a Zipps employee who was later identified as LUDWIN BENJAMIN PEREZ VELASCO (**VELASCO**), date of birth in 2003, on the premises. **VELASCO** was moved to a designated area where all Zipps employees were temporarily detained.

11. While in the temporary designated area, Law Enforcement Officers asked **VELASCO** for identification. **VELASCO** did not have identification, but stated his name and indicated he was working under the name of “Jared Jimenez Corona.” It was determined that **VELASCO** is a citizen and national of Guatemala, who was unlawfully present in the United States.
12. On January 26, 2026, at approximately 9:38 P.M., **VELASCO** was advised of his constitutional rights. **VELASCO** agreed to waive his rights and chose to speak with law enforcement without a lawyer present. **VELASCO** stated his true name is LUDWIN BENJAMIN PEREZ VELASCO and that he is a citizen and national of Guatemala. He stated he illegally entered the United States on or about April 2022 through the desert in an unknown state. **VELASCO** stated he paid approximately \$80,000 Guatemalan Dollars to be smuggled into the United States. **VELASCO** stated he presented fraudulent State identification and social security documents that he received from an unidentified friend to gain employment at Zipps. **VELASCO** stated that he returned the fraudulent identification documents to his friend after their use.
13. **VELASCO** was asked about the documents he presented to be hired by Zipps on April 7th, 2022. **VELASCO** specifically came for employment at Zipps and admitted that he presented the fraudulent Arizona State Identification Card and fraudulent Social

Security Card to be hired at Zipps. **VELASCO** admitted that he falsely attested on his I-9 that he was a United States citizen. The date of birth and the social security number used to apply to Zipps was verified and confirmed with E-Verify with a case verification number 2022098224905EJ. However, the date of birth **VELASCO** provided during his encounter did not match the date of birth and social security number he used to apply to Zipps.

14. Immigration history checks on **VELASCO** also revealed that he has no known law enforcement encounters and that he does not possess any lawful documents to enter, pass through, remain or be employed in the United States.

15. For these reasons, this affiant submits that there is probable cause to believe that **VELASCO** did knowingly use a false attestation, that is, a statement that he is a United States Citizen with the name JARED JIMENEZ CORONA, on an employment eligibility Verification Form I-9 and provide a false social security number and a false date of birth, in violation of Title 18, United States Code, Section 1546(b)(3).

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16. This affidavit was sworn to telephonically before a United States Magistrate Judge legally authorized to administer an oath for this purpose. I have thoroughly reviewed the affidavit and the attachments to it, and attest that there is sufficient evidence to establish probable cause that the defendant violated Title 18, United States Code, Sections 1546(b)(3).

NIZA-RENEE
ZAMUDIO

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Niza Zamudio
Special Agent
Homeland Security Investigations

Sworn to telephonically on
January 28, 2026



Michael T. Morrissey
United States Magistrate Judge