

FILED

DEC 22 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

SANTOS TEODORO AC-SALAZAR
and OLGA CHOC LAJ

No. 20 CR 700

Violations: Title 8, United States Code,
Sections 1324(a)(1)(A)(iii),
1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i);
Title 18, United States Code, Sections 2,
1589(a)(1), 1589(a)(2), 1589(a)(3), and
1589(a)(4)

JUDGE ELLIS

COUNT ONE

MAGISTRATE JUDGE COLE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

1. At times material to this Indictment:
 - a. Guatemala is a country located in Central America.
 - b. In February 2019, Minor A was a 15-year-old Guatemalan citizen and national.
 - c. In May 2019, Minor B was an approximately 10-year-old Guatemalan citizen and national.
 - d. Defendants SANTOS TEODORO AC-SALAZAR and OLGA CHOC LAJ are Guatemalan citizens and nationals who resided with Minor A and Minor B in Residence A, located in Aurora, Illinois, in the Northern District of Illinois, and elsewhere.

2. Beginning in or around February 2019, and continuing until on or about February 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, knowingly conspired with each other, and with others known and unknown, to conceal, harbor, and shield from detection aliens, namely Minor A and Minor B, in Residence A and elsewhere, knowing and in reckless disregard of the fact that Minor A and Minor B had come to, entered, and remained in the United States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

3. It was part of the conspiracy that AC-SALAZAR and CHOC LAJ planned and agreed that they would separately enter the United States unlawfully with a child in order to more easily be allowed entry into the United States and to avoid prolonged detention by U.S. immigration authorities.

4. It was further part of the conspiracy that AC-SALAZAR and CHOC LAJ used smugglers and third parties to locate Minor A and Minor B in Guatemala as the children with whom AC-SALAZAR and CHOC LAJ would unlawfully enter into the United States.

5. It was further part of the conspiracy that, in or around February 2019, Minor A left her family in Guatemala to travel to the United States with CHOC LAJ.

6. It was further part of the conspiracy that, on or about February 21, 2019, Minor A and CHOC LAJ entered the United States near El Paso, Texas, and

encountered U.S. Customs and Border Protection ("CBP") officials. CHOC LAJ provided the CBP officials with fraudulent identity information about CHOC LAJ and Minor A, and also falsely represented that Minor A was CHOC LAJ's daughter.

7. It was further part of the conspiracy that, after the CBP officials released CHOC LAJ and Minor A from custody pending removal proceedings, CHOC LAJ failed to appear for a scheduled immigration hearing and caused Minor A to fail to appear for a scheduled immigration hearing.

8. It was further part of the conspiracy that, after arriving in the United States, CHOC LAJ and Minor A lived in Virginia before CHOC LAJ took Minor A to Florida in or around March 2019 and later took Minor A to Aurora, Illinois, in or around April 2019, in order to conceal, harbor, and shield Minor A from detection.

9. It was further part of the conspiracy that, in or around April 2019, AC-SALAZAR adopted Minor B in Guatemala in order to more easily be allowed entry into the United States and to avoid prolonged detention by U.S. immigration authorities.

10. It was further part of the conspiracy that, in or around May 2019, Minor B left her family in Guatemala to travel to the United States with AC-SALAZAR.

11. It was further part of the conspiracy that, on or about May 10, 2019, Minor B and AC-SALAZAR entered the United States near El Paso, Texas, and encountered CBP officials.

12. It was further part of the conspiracy that, after the CBP officials released AC-SALAZAR and Minor B from custody pending removal proceedings, AC-SALAZAR failed to appear for a scheduled immigration hearing and caused Minor B to fail to appear for a scheduled immigration hearing.

13. It was further part of the conspiracy that, after arriving in the United States, AC-SALAZAR took Minor B to Aurora, Illinois, in or around May 2019, to live with CHOC LAJ and Minor A in Residence A, located in the Northern District of Illinois.

14. It was further part of the conspiracy that AC-SALAZAR and CHOC LAJ took steps to harbor, conceal, and shield from detection Minor A and Minor B, in Residence A and elsewhere, including:

- a. failing to enroll Minor A and Minor B in school;
- b. falsely telling third parties that Minor A and Minor B did not speak Spanish;
- c. providing false information to third parties about Minor A and Minor B, including their ages and familial relationship to AC-SALAZAR and CHOC LAJ;
- d. prohibiting Minor A and Minor B from leaving Residence A except in limited circumstances;
- e. instructing Minor A and Minor B to provide false information to third parties, including law enforcement authorities;

f. taking nearly all of Minor A's earnings from jobs that AC-SALAZAR and CHOC LAJ forced Minor A to work in Florida and in or around Aurora, Illinois; and

g. instructing Minor A to hide when police, social service workers, and unknown individuals came to Residence A.

15. It was further part of the conspiracy that AC-SALAZAR and CHOC LAJ concealed and hid, and caused to be concealed and hidden, the existence of, and acts done in furtherance of, the conspiracy.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1 and 3 through 14 of Count One of this Indictment are incorporated herein.

2. Between in or around February 2019, and continuing until on or about February 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, for the purpose of commercial advantage and private financial gain, concealed, harbored, and shielded from detection an alien, namely Minor A, in Residence A and elsewhere, knowing and in reckless disregard of the fact that Minor A had come to, entered, and remained in the United States in violation of law;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1 and 3 through 14 of Count One of this Indictment are incorporated herein.

2. Between in or around May 2019, and continuing until on or about February 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, for the purpose of commercial advantage and private financial gain, concealed, harbored, and shielded from detection an alien, namely Minor B, in Residence A and elsewhere, knowing and in reckless disregard of the fact that Minor B had come to, entered, and remained in the United States in violation of law;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i), and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1 and 3 through 14 of Count One of this Indictment are incorporated herein.

2. Between in or around February 2019, and continuing until on or about February 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, knowingly provided and obtained the labor and services of a person, namely Minor A, by means of: (a) force, threats of force, physical restraint, and threats of physical restraint to Minor A or another person; (b) serious harm and threats of serious harm to Minor A or another person; (c) the abuse and threatened abuse of law and legal process; and (d) a scheme, plan, and pattern intended to cause Minor A to believe that, if Minor A did not perform such labor and services, Minor A or another person would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a)(1), (a)(2), (a)(3), (a)(4), and 2.

COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

1. The allegations in paragraphs 1 and 3 through 14 of Count One of this Indictment are incorporated herein.

2. Between in or around May 2019, and continuing until on or about February 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, knowingly provided and obtained the labor and services of a person, namely Minor B, by means of: (a) force, threats of force, physical restraint, and threats of physical restraint to Minor B or another person; (b) serious harm and threats of serious harm to Minor B or another person; and (c) a scheme, plan, and pattern intended to cause Minor B to believe that, if Minor B did not perform such labor and services, Minor B or another person would suffer serious harm and physical restraint;

In violation of Title 18, United States Code, Sections 1589(a)(1), (a)(2), (a)(4), and 2.

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 8, United States Code, Section 1324(a), as alleged in Counts One through Three of this Indictment,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, shall forfeit to the United States of America the gross proceeds of such violation, and any property traceable to such proceeds, as provided by Title 8, United States Code, Section 1324(b)(1).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1589, as alleged in Counts Four and Five of this Indictment,

SANTOS TEODORO AC-SALAZAR and
OLGA CHOC LAJ,

defendants herein, shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Sections 1594(d)(1) and (d)(2).

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the

United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY