

ORIGINAL

United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

ADRIAN GUERRERO-SANCHEZ (1)
FERNANDO GARCIA-SANTIAGO (2)
JOSE FORTINO GUERRERO-SANCHEZ (3)
MONICA MUNOZ-CASTILLO (4)

CASE NUMBER: 3-06-MJ- 47

(Name and Address of Defendant)

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
FEB - 3 2006
TEXAS
CLERK, U.S. DISTRICT COURT
BY
DEPUTY

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 2, 2006 in Dallas County, in the Northern District of Texas defendant(s) did,

intentionally and willfully combine, conspire, confederate and agree with each other and others unknown to the United States to commit an offense against the United States, to wit: knowingly forging and counterfeiting alien registration cards, social security cards and Texas drivers' licenses,

in violation of Title 18 United States Code, Section(s) 371 and 1546.

I further state that I am a(n) Senior Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE) and that this complaint is based on the following facts:

See attached Affidavit of Senior Special Agent Felix Chavez, ICE which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No

Signature of Complainant
FELIX CHAVEZ
Special Agent, FBI

Sworn to before me and subscribed in my presence, on this 3rd day of February, 2006, at Dallas, Texas.

Wm. F. SANDERSON, JR.
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

Affiant, Felix Chavez, is a Senior Special Agent (SSA) with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), SAC Dallas Office currently assigned to the Identity and Benefit Fraud Unit and has over nine years of investigative experience. Affiant has over thirty months working on investigations regarding the creation and use of fraudulent identification documents to include alien registration cards, social security cards and state drivers' licenses. Affiant, being duly sworn, states that the following facts are true and correct to the best of his knowledge and belief:

1. On January 25, 2006, Affiant met with Captain Alex Pena, an investigator with the Office of the Attorney General of Texas (AG). Captain Pena informed SSA Chavez that he and other investigators had been in the Dallas/Fort Worth area during the week of January 9, 2006 through January 13, 2006, attempting to buy fraudulent Texas Drivers' licenses and identification cards. Captain Pena related that at the "Jerry's Supermercado" parking lot on January 11, 2006, the Confidential Informant (CI) they were using was able to buy a Texas Identification Card, a Social Security Card and a Permanent Resident Card from a vendor. Captain Pena provided these documents to the Affiant, who determined these documents were fraudulent in nature.

2. Captain Pena informed Affiant that on January 11, 2006, he and other AG investigators conducted surveillance on the "Jerry's Supermercado" parking lot, located at the corner of North Henderson and Capitol streets in Dallas, Texas. They located an individual, later identified through a Texas Drivers' license photo (obtained from database

checks of the subject's vehicle license plate), as **Adrian GUERRERO**. The CI met with **Adrian GUERRERO** and arranged to purchase the fraudulent documents described above for \$240.00. The CI gave **Adrian GUERRERO** a slip of paper with pertinent information (i.e., name, date of birth, address) to be put on the documents. The CI also provided a small color photograph to be used on the documents and a \$60 down payment. **Adrian GUERRERO** told the CI to return in an hour.

3. On January 11, 2006, AG investigators maintained surveillance on **Adrian GUERRERO**, who met with another individual in a dark blue Toyota (Texas license plate number 701 GXP) in the same parking lot. AG investigators identified the individual in the vehicle as **GARCIA**. Immediately after this meeting, **GARCIA** departed the parking lot and drove towards the vicinity of 5018 San Jacinto. Approximately an hour later, the CI once again met with **Adrian GUERRERO** at the "Jerry's Supermercado" parking lot. **Adrian GUERRERO** made a call on a cellular phone and a short time later, **GARCIA** returned to this parking lot. **Adrian GUERRERO** was observed meeting with **GARCIA**, who handed **Adrian GUERRERO** a small, brown envelope. **Adrian GUERRERO** walked over to the CI and gave the CI the same small, brown envelope which contained the aforementioned fraudulent documents. The CI then paid **Adrian GUERRERO** the remaining \$180.00 for these documents.

4. Also on January 11, 2006, AG investigators observed **Adrian GUERRERO** meet with three unidentified individuals at the "Jerry's Supermercado" parking lot. These individuals followed **Adrian GUERRERO** to the "Unicorn Beauty Salon" across the street and entered the business. A short time later all but **Adrian GUERRERO** left the salon. At

this time, AG investigators observed **Adrian GUERRERO** count money into several stacks and making notes on each stack. He then folded a portion of the money and placed it into his right front pocket and placed the remaining money into a cabinet drawer located in the front of the salon. He then closed the drawer and left the salon.

5. Captain Pena informed Affiant that on January 12, 2006, AG investigators once again conducted surveillance at the "Jerry's Supermercado" location. They observed **Adrian GUERRERO** meeting with several people. After this, **Adrian GUERRERO** immediately went to a vehicle driven **GARCIA**. **Adrian GUERRERO** provided **GARCIA** with some type of paper and **GARCIA** immediately left the parking lot. AG investigators maintained surveillance on **GARCIA** and observed the vehicle arrive at 5018 San Jacinto, Dallas, Texas. Investigators observed **GARCIA** and an unidentified individual exit the vehicle and walk into apartment number 105. Approximately 45 minutes later, investigators observed **GARCIA** and his companion exit apartment number 105, enter the vehicle and drive away. Investigators followed **GARCIA** back to the "Jerry's Supermercado" parking lot. AG investigators observed **GARCIA** give **Adrian GUERRERO** a small, brown envelope - similar to the envelope which contained the fraudulent documents **Adrian GUERRERO** provided to the CI the day before. **Adrian GUERRERO** then provided this envelope to one of the individuals he had been speaking with earlier.

6. On January 26, 2006, ICE and AG agents, conducted concurrent surveillance at the "Jerry's Supermercado" and 5018 San Jacinto locations. ICE and AG agents at the 5018 San Jacinto location observed **GARCIA** exit apartment number 105. **GARICA** then

drove to the parking lot of the "Jerry's Supermercado". AG investigators observed **GARCIA** exit the vehicle and meet with **Adrian GUERRERO**, who had been at this location from the start of the surveillance. AG investigators observed **GARCIA** give **Adrian GUERRERO** a small, brown envelope - similar to the envelope which contained fraudulent documents **Adrian GUERRERO** provided the CI on January 11, 2006. **Adrian GUERRERO** then handed the envelope to the driver of that vehicle.

7. Also on January 26, 2006, Affiant observed **Adrian GUERRERO** walk from the "Jerry's Supermercado" parking lot to the "Unicorn Beauty Salon". Affiant observed **Adrian GUERRERO** sit down behind the aforementioned counter in the salon. **Adrian GUERRERO**, who was carrying a folded newspaper, opened the newspaper, took money out and placed the money into the same cabinet drawer as previously observed on January 11, 2006. He then returned to the parking lot of "Jerry's Supermercado".

8. On January 31, 2006, ICE and AG agents once again conducted concurrent surveillance at the "Jerry's Supermercado" and 5018 San Jacinto locations. ICE and AG agents observed **GARCIA** arrive at the parking lot, get out of his vehicle and approach a person seated in another vehicle. **GARCIA** took cash from the person in the other vehicle. **GARCIA** next approached **Adrian GUERRERO** and gave **Adrian GUERRERO** the cash. A short time later, another person approached **Adrian GUERRERO** and gave him cash. **Adrian GUERRERO** wrote something on a piece of paper and handed the note to **GARCIA**. ICE and AG agents observed **GARCIA** leave the area and arrive at the 5018 San Jacinto location. The agents then observed **GARCIA** enter apartment number 105. A short time later, ICE and AG agents observed **GARCIA** depart apartment 105 and drive to the

“Jerry’s Supermercado” parking lot. **GARCIA** gave **Adrian GUERRERO** two small, brown envelopes - similar to the envelope which contained fraudulent documents that **Adrian GUERRERO** provided the CI on January 11, 2006. **Adrian GUERRERO** then gave one envelope to the person who had given him cash earlier and another envelope to the person who was sitting in another vehicle (that initially gave cash to **GARCIA**).

9. Also on January 31, 2006, ICE and AG agents observed **MUNOZ** arrive at the beauty salon and walk across the street to the “Jerry’s Supermercado” parking lot. There she handed **Adrian GUERRERO** a large, overnight/postal envelope. He wrote something on the envelope and returned it to **MUNOZ**. She then walked back to the salon and went behind the aforementioned counter in the salon. She then placed the envelope into the same cabinet drawer where **Adrian GUERRERO** was previously observed placing money. Also on this date, agents observed **Adrian GUERRERO** receive money after completing two transactions. Agents then observed him walk to the beauty salon, where he met with **MUNOZ**. He handed **MUNOZ** an unknown amount of cash and she placed the cash into the same cabinet as mentioned above. She then handed him a folded newspaper. **Adrian GUERRERO** then returned to the “Jerry’s Supermercado” parking lot. A few minutes later, agents observed a gust of wind blow the newspaper open and the agents observed a notebook which was located within the newspaper. It is the Affiant’s experience that individuals involved in the production and distribution of fraudulent documents often maintain a ledger of transactions, monies paid, monies owed, descriptions of customers, etc.

10. On February 2, 2006, ICE and AG agents, along with agents working with the North Texas Identity Theft Taskforce (NTITF), executed Federal Search warrants for the

5018 San Jacinto address, the “Unicorn Beauty Salon” and **Adrian GUERRERO’s** residence.

11. On February 2, 2006, agents were dispatched to execute the warrant at the 5018 San Jacinto, apartment 105 address. After agents arrived there, they observed **GARCIA** arrive along with Ricardo Lara-Sanchez in the dark blue Toyota. Agents observed **GARCIA** and Lara enter apartment 105. A short time later, agents observed **Jose GUERRERO** arrive with Carlos Chavez in a pickup truck. They also entered apartment 105. Agents then observed **Jose GUERRERO** and Lara come out of the apartment and load a desk onto the pickup truck. At this time agents converged on the apartment. Upon noticing the agents, **Jose GUERRERO** and Lara attempted to flee, but were apprehended by agents. Agents then entered the apartment and conducted the search. They found the following items:

- 2 completed fraudulent alien registration cards
- Approximately 115 laminates for use on alien registration cards
- 6 laminates for use on fraudulent Texas Drivers licenses
- 5 sheets of fraudulent Social Security Card stock, with 8 cards on each sheet
- 5 blank fraudulent Mexican Birth Certificates
- 1 paper cutter
- 1 ink stamper
- 21 “exacto” knife blades
- 2 typewriters
- Heat sealer
- Numerous document cuttings

12. Agents advised the four individuals of their rights. All but Chavez refused to make a statement. Chavez stated that he and the other individuals – including **GARCIA** and **Jose GUERRERO** had begun moving items, to include a computer and a typewriter, to

another apartment. Chavez agreed to take an agent to the other apartment which was located at 4710 Munger, Apartment 203, Dallas, Texas 75206. During a search incident to arrest of the four individuals, agents discovered that both **Jose GUERRERO** and **GARCIA** had a key to the apartment located at 4710 Munger on their person. A state search warrant was obtained and agents executed the search at this location. They found the following items:

- a desktop computer displaying a scanned image of a fraudulent alien registration card on the computer monitor
- approximately 8 blank fraudulent Social Security cards
- 2 torn fraudulent alien registration cards
- 1 flatbed scanner
- 1 printer for the computer
- 2 laminators
- 1 paper cutter
- 1 corner cutter
- 1 typewriter
- 1 loaded .25 caliber pistol
- 1 loaded .357 magnum revolver

13. Also on February 2, 2006, agents executed the search warrant at the “Unicorn Beauty Salon”. When agents entered, they observed **MUNOZ** standing next to the cabinet observed in previous surveillance. Agents observed **MUNOZ** attempt to hide something under her leg where she was sitting. Upon orders from the agents, **MUNOZ** took a Polaroid type photograph from under her leg and gave it to the agents. One of the agents recognized the photograph to be that of a person who had just been in the salon. Agents also recognized the photograph as one of the type that could be used for a fraudulent document, such as a fraudulent Texas Drivers license or alien registration card. Agents then interviewed the manager of the salon who stated that **MUNOZ** rented the space where the aforementioned cabinet is located for \$50 per week. Agents also found several receipts which showed \$50

payments from **MUNOZ** to the salon for the rent of this space. **MUNOZ** admitted to being in the United States illegally. Agents then obtained **MUNOZ**' consent to search the vehicle she was driving, a black Lincoln Navigator (Texas License Plate 716 JTF). In **MUNOZ**' purse in the vehicle agents found a fraudulent Social Security card in her name. Checks of this vehicle indicate that **Jose GUERRERO** is the registered owner. **Jose GUERRERO** is **MUNOZ**'s common law husband and is a cousin to **Adrian GUERRERO**.

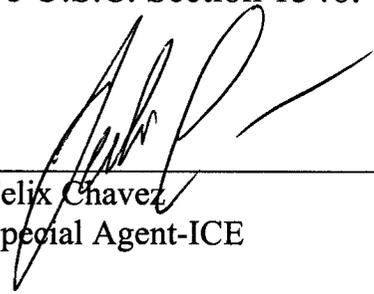
14. Also on February 2, 2006, agents executed the search warrant on **Adrian GUERRERO**'s residence. During the search, agents found the following:

- a total of \$3,000 in United States currency, separated into different piles. and/or envelopes and located throughout the residence.
- several blank fraudulent Social Security cards.
- several fraudulent alien registration cards.
- several fraudulent Texas state vehicle inspection stickers.
- a fraudulent alien registration card made for **Adrian GUERRERO**.

CONCLUSION

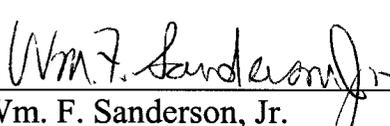
Based on these facts, Affiant believes there is probable cause to issue a complaint charging **Adrian GUERRERO-Sanchez, Fernando GARCIA-Santiago, Jose Fortino GUERRERO-Sanchez and Monica MUNOZ-Castillo** with violating Title 18 U.S.C. Section 371, by intentionally and willfully combining, conspiring, confederating and agreeing with each other and others unknown to the United States Attorney to commit an offense against the United States, that is, knowingly

forging and counterfeiting alien registration cards, social security cards and Texas drivers' licenses, in violation of Title 18 U.S.C. Section 1546.



Felix Chavez
Special Agent-ICE

Subscribed and sworn to before me on this 3rd day of February 2006.



Wm. F. Sanderson, Jr.
UNITED STATES MAGISTRATE JUDGE