

United States District Court

for the
Southern District of Texas

UNITED STATES OF AMERICA)	
V.)	
Juan Carlos LOPEZ JR.)	Case Number:
)	
)	

CRIMINAL COMPLAINT

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

On or about the date(s) of December 04, 2025 in the county of Webb in
(Date)

Southern District of Texas, the defendant(s) violated: _____ the

Code Section

Offense Description

Title 8 United States Code, Section 1324

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did unlawfully transport and move, attempt to transport and move, and conspire to transport and move said alien by means of transportation and otherwise within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on the attached sheet.

/s/ Jesus Enrique Trevino
Complainant's Signature

Jesus Enrique Trevino, Special Agent
Printed Name and Title

Sworn to before me and signed in my presence,

Date: December 5, 2025

Judge's Signature

City and State: Laredo, Texas

Hon. Christopher dos Santos, Magistrate Judge
Printed Name and Title

UNITED STATES OF AMERICA

V.

Juan Carlos
LOPEZ JR.

[CONT OF BASIS OF COMPLAINT]

1. On or about Thursday, December 4, 2025, at approximately 2:31 p.m., Laredo Border Patrol West Station (BPW) received communications from Department of Defense (DoD) personnel regarding migrants and a gray Cadillac. A Border Patrol (BP) unit in the area occupied by two Border Patrol Agents (BPAs) from BPW did a turnaround and proceeded south on Mines Rd. While driving south on Mines Rd., the BPW BPAs activated their emergency lights due to a vehicle obstructing their lane of travel. When the vehicle switched lanes, the BP unit emergency lights remained on and upon the BP unit passing Tiendas Rd., the BPAs witnessed a Cadillac switching from the left lane to the right lane. At this time the BPAs did not have full visual confirmation of the reported subject vehicle. When the Cadillac switched from the right lane to the left lane, the BPAs advised via radio of a positive visual confirmation of the subject vehicle.
2. On or about Thursday, December 4, 2025, at approximately 2:31 p.m., a BPA from the Laredo Border Patrol North Station (LRN) was performing his assigned duties on Mines Rd. The LRN BPA was operating his marked service vehicle at the time when he received a transmission via radio that a gray Cadillac SUV had loaded suspected illegal aliens at the Ben-Hur Ranch located off Mines Rd.
3. The LRN BPA observed a mid-size silver Cadillac SUV bearing a Texas license plate being pursued by a marked BP unit from BPW with its emergency equipment activated. The LRN BPA activated his emergency lights and sirens and advised the Laredo Border Patrol Communications Center he was assisting in the vehicle pursuit. At that time, the BPW BPAs terminated their unit's emergency equipment and returned to their area of responsibility. At this time, a BPA from the LRN station became the primary unit and the Cadillac SUV continued south on Mines Rd. past Trade Center Blvd. where a Texas Department of Public Safety (TXDPS) State Trooper became the primary pursuit vehicle.
4. The Cadillac SUV then turned right onto Riverbank Rd. and proceeded toward Aquero Blvd. Upon reaching the end-of-road signage, the Cadillac SUV drove around the signage and entered a dirt road. At that time, an LRN BPA then assumed the primary role in the pursuit and the Cadillac SUV continued toward a cliff area and came to a stop. When the Cadillac SUV came to a stop, the LRN BPA exited his unit and attempted to detain the driver of the vehicle. The LRN BPA heard aggressive engine revolutions and observed the tires of the vehicle spinning thus indicating intentional acceleration. At that point, the driver of the Cadillac SUV vehicle reversed the vehicle at a high rate of speed towards the direction of the LRN BPA, narrowly missed the LRN BPA and struck the front bumper of an assisting LRN BP unit which was occupied by another LRN BPA.
5. The subject, later identified as Juan Carlos LOPEZ JR., exited the driver's seat and attempted to flee on foot. An LRN BPA engaged in a foot pursuit of LOPEZ JR. and attempted to physically gain control of LOPEZ JR. LOPEZ JR. continued toward a cliff and both an LRN BPA and LOPEZ JR. fell an estimated 12 feet onto a lower level. After a brief struggle with LOPEZ JR., two LRN BPAs successfully placed handcuffs on LOPEZ JR. A subsequent search of the Cadillac SUV revealed seven concealed undocumented individuals. An immigration inspection was conducted by BPAs and each subject admitted to being unlawfully present in the United States without valid immigration documents. All subjects were placed under arrest and transported to the LRN station for further processing. The facts outlined above are based on BP reports.
6. Homeland Security Investigations (HSI) was contacted and responded to the LRN station for investigative assistance. HSI attempted to interview LOPEZ JR., but he declined to offer a statement.
7. Miguel Yac VICENTE was identified as a material witness. VICENTE is a native citizen of Guatemala. VICENTE does not have documentation to remain in the United States. VICENTE stated arrangements were made and a total fee of 160,000 Quetzales was to be paid by him monthly in order for him to be smuggled into the interior of the United States.
8. Diego Armando GARCIA-GARCIA was identified as a material witness. GARCIA-GARCIA is a native citizen of Guatemala. GARCIA-GARCIA does not have documentation to remain in the United States. GARCIA-GARCIA stated arrangements were made by a family member in order for him to be smuggled into the interior of the United States.

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