

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.
Adrian Isaac PIMENTEL-Garcia

Case No.

Defendant(s)

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 05, 2025 in the county of Webb in the Southern District of Texas, the defendant(s) violated:

Code Section
8 USC 1324

Offense Description
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 transport and move and attempted to transport and move and conspired to transport and move such alien 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 Affidavit

[checked] Continued on the attached sheet.

/S/Arely G. Molina

Complainant's signature

Arely G. Molina, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: December 08, 2025

Judge's signature

City and state: Laredo, Texas

Christopher dos Santos, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Adrian Isaac PIMENTEL-Garcia

Case Number:

ENCOUNTER:

On December 5, 2025, a Border Patrol Agent (BPA), along with another BPA, were assigned to work the Gravel Pit area of the Laredo South area of responsibility. The Gravel Pit area is commonly used for human smuggling as it is a neighborhood near the river and allows for quick load ups. At approximately 1445 hours, a sensor activated, indicating possible illegal aliens were walking towards Ventura St. Both BPAs quickly responded to the area.

A BPA dropped off his partner at the corner of Wilhelm and Ventura. As the BPA began walking west on Ventura, he heard individuals climbing the fence from a nearby residence. The BPA responded to the residence and encountered three subjects who had wet and muddy clothing, common description with illegal aliens who just crossed the river. The BPA was able to apprehend four subjects. While the BPA was waiting for additional agents, he heard over the service radio that there was a male subject on top of a roof of a neighboring residence.

The BPA located the residence and observed the male subject atop the roof of the home. He was on the phone with an unknown person and was wearing a camouflage jacket and pants. Being on the phone while in a smuggling event is common practice for foot guides as they are receiving live updates from other smuggling partners to successfully smuggle illegal aliens. The BPA observed another BPA giving him commands to get off the roof and surrender. The subject then jumped off the roof in the direction of another BPA and struck him in the face with a kick, knocking him to the ground. The subject then ran in an attempt to avoid apprehension. A BPA stayed behind with the four subjects while other BPAs and the BPA began running after the subject as he ran towards Zaragoza Street and Mowry. The subject continued to run west towards the Rio Grande River in an attempt to evade apprehension. After an extensive search, a BPA located the subject hiding in dense brush wearing only shorts. After a search of the immediate vicinity of the subject, the camouflage jacket and pants were found as he took them off to avoid detection. The subject was identified as Adrian Isaal PIMENTEL-Garcia and was the suspected foot guide of the group. After an immigration inspection, all five subjects were found to be illegal aliens and placed under arrest. All subjects were transported to the Laredo South Station for further investigation.

PRINCIPAL SWORN STATEMENT:

The following is an audio/video recording of Principal Adrian Isaal PIMENTEL-Garcia.

Adrian Isaal PIMENTEL-Garcia was read his Miranda rights by a BPA witnessed by another BPA. PIMENTEL-Garcia acknowledged his Miranda rights and advised he was willing to provide a statement without a lawyer present. PIMENTEL-Garcia stated he crossed the Rio Grande River with four others and was instructed by an unknown person in Mexico to be alert and if he sees Border Patrol Agents, to run. He instructed the group to not make noise, and he used maps on his cellphone to know where to go, all while on the phone with the load vehicle driver. Once he encountered the agents, the person on the phone instructed him to run. PIMENTEL-Garcia stated he was to be paid \$100 United States Dollars per person he successfully smuggled and claims to have successfully smuggled multiple groups of illegal aliens before. He did not know what vehicle was going to pick them up and is only told the make and model of the vehicle once the coast is clear. Once the group is picked up, he either goes with the load vehicle and is later dropped off at the bridge, or he just walks back to the river and swims back to Mexico. He admitted that he knows smuggling illegal aliens is against the law and he knew the people he was smuggling today were illegal aliens and does it because it is easy money. PIMENTEL-Garcia admitted that he has no immigration documents that allow him to remain in the country legally.

MATERIAL WITNESS SWORN STATEMENT:

The following is an audio/video recording of Material Witness JULIAN-Baez, Ricardo.

JULIAN-Baez stated he crossed the Rio Grande River on December 5, 2025, in a group with four others. He stated he did not know who the guide was, but that one of the males in the group, which he referred to as "El Guero", was the only one who knew the area. He described "El Guero" as wearing black pants, a camouflage sweater, and having neck Tattoos. JULIAN-Baez stated PIMENTEL-Garcia instructed the group to follow him. They reached an unknown house and that is where BPAs apprehended the group and PIMENTEL absconded but was later apprehended. JULIAN-Baez stated his family paid approximately 50,000 Mexican Pesos to be smuggled to the United States (US) and did not have a specific destination, just anywhere in Texas. JULIAN-Baez admitted to being illegally present in the US without any immigration documents to allow him to remain in the country legally.

A six-person photo lineup was presented to JULIAN-Baez and he successfully identified Adrian Isaal PIMENTEL-Garcia as "El Guero" and the one guiding the group.

SUBSCRIBED and SWORN to before me on

8th day of December, 2025

Signature of Judicial Officer

/S/ Molina, Arely G. Border Patrol Agent
Signature of Complainant