

FILED

April 23, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

REDACTED COPY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

BY: CR
DEPUTY

UNITED STATES OF AMERICA

v.



EDGAR ALEJANDRO ELIZONDO (11)
A/K/A "FLACO"

CAUSE NO.: DR24-CR-02255-AM

**SECOND SUPERSEDING
INDICTMENT**

[VIO: COUNT ONE: 8 U.S.C. §
1324(a)(1)(A)(v)(I) & (B)(iii),
Conspiracy to Transport Illegal Aliens
Placing Lives in Jeopardy; COUNTS
TWO - FOUR: 8 U.S.C. §
1324(a)(1)(A)(ii) & (B)(iii), Illegal
Alien Transportation Placing Lives in
Jeopardy; COUNT FIVE: 8 U.S.C. §
1324(a)(1)(A)(v)(I) & (B)(iii)
Conspiracy to Harbor Illegal Aliens;
COUNT SIX: 8 U.S.C.
§1324(a)(1)(A)(iii) & (B)(iii) -
Harboring Illegal Aliens; COUNT
SEVEN: 18 U.S.C. § 1203 – Conspiracy
to Commit Hostage Taking;
COUNT EIGHT: 18 U.S.C. § 1203 –
Hostage Taking.]

FORFEITURE

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(iii)]

Between on or about September 1, 2023 through on or about the date of this indictment, in
the Western District of Texas, and elsewhere Defendant,

EDGAR ALEJANDRO ELIZONDO (11) A/K/A "FLACO"

did knowingly and intentionally combine, conspire, confederate and agree together and with others, to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who came to, entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, and during and in relation to said offense, Defendant's conduct placed in jeopardy the life of one and more than one persons, all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) & (B)(iii).

COUNT TWO

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(iii)]

On or about August 15, 2024, in the Western District of Texas, Defendant,

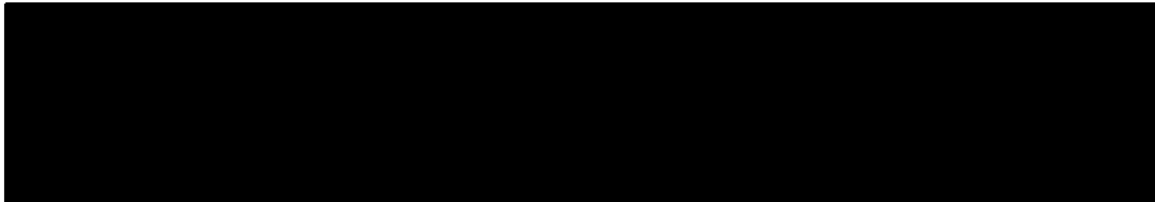
knowing and in reckless disregard of the fact that a certain alien, namely, CARLOS ROLANDO MARTINEZ-RODRIGUEZ, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, and during and in relation to said offense, Defendant's conduct placed in jeopardy the life of

one and more than one persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(iii).

COUNT THREE

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(iii)]

On or about October 29, 2024, in the Western District of Texas, Defendant,

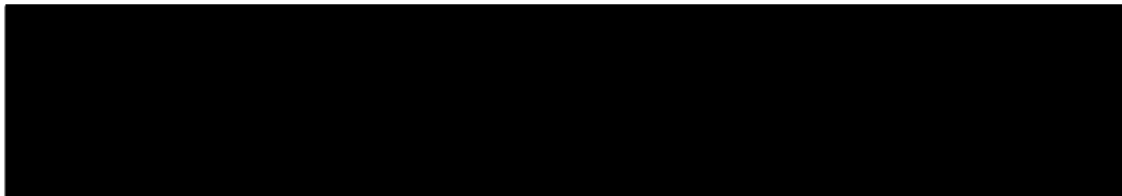


knowing and in reckless disregard of the fact that a certain alien, namely, ANDRES GUEVARA-ZARATE, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, and during and in relation to said offense, Defendant's conduct placed in jeopardy the life of one and more than one persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(iii).

COUNT FOUR

[8 U.S.C. § 1324(a)(1)(A)(ii) & (B)(iii)]

On or about February 9, 2025, in the Western District of Texas, Defendant,



knowing and in reckless disregard of the fact that a certain alien, namely, HEIDI PAOLA GOMEZ-MARTINEZ, had come to, entered and remained in the United States in violation of law, did willfully and unlawfully transport and move, and attempt to transport and move, said alien within the United States by means of transportation and otherwise, and in furtherance of such violation of law, and

during and in relation to said offense, Defendant's conduct placed in jeopardy the life of one and more than one persons, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(iii).

COUNT FIVE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about October 9, 2023 in the Western District of Texas, Defendants,



EDGAR ALEJANDRO ELIZONDO (11) A/K/A "FLACO"

did knowingly and intentionally combine, conspire, confederate and agree together and with others, to conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection, aliens who came to, entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) & (B)(i).

COUNT SIX

[8 U.S.C. § 1324(a)(1)(A)(iii) & (B)(i)]

On or about October 9, 2023, in the Western District of Texas, Defendant,



EDGAR ALEJANDRO ELIZONDO (11) A/K/A "FLACO"

knowing and in reckless disregard of the fact that a certain alien, namely, ROBERTO MARTINEZ - ARMENTA, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection and attempted to conceal, harbor, and shield from detection said alien in buildings and other places, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (B)(i).

COUNT SEVEN

[18 U.S.C. § 1203(a)]

On or about October 11, 2023, in the Western District of Texas, and elsewhere, Defendants,

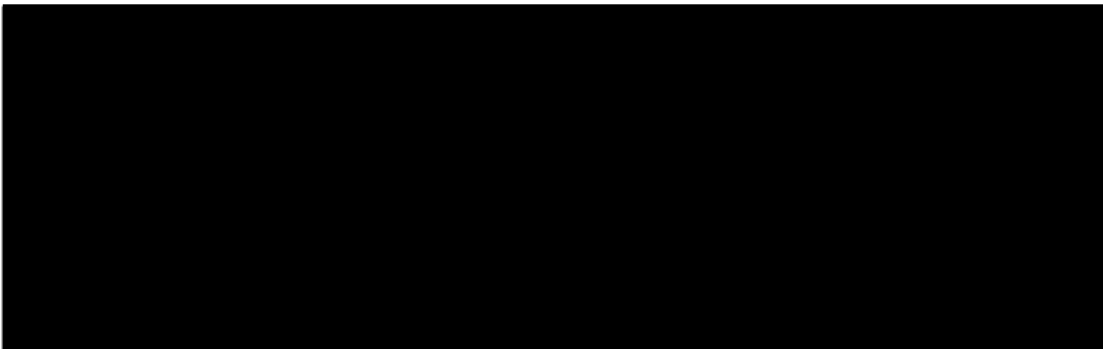


did knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown to intentionally seize and detain and threaten to kill, injure, and continue to detain E.J.T. in order to compel another to forward, by means of electronic wire transfer, funds in the form of United States Dollars, as an explicit and implicit condition for the release of said person, in violation of Title 18, United States Code, Section 1203(a).

COUNT EIGHT

[18 U.S.C. § 1203(a)]

On or about October 11, 2023, in the Western District of Texas, and elsewhere, Defendants,



did intentionally seize and detain and threaten to kill, injure, and continue to detain E.J.T., in order to compel another to pay money and property, as an explicit condition for the release of the hostage, E. J. T., all in violation of Title 18, United States Code, Section 1203.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See FED. R. CRIM. P. 32.2]

I.

Immigration Violations and Forfeiture Statute

[Title 8 U.S.C. § 1324(a)(1)(A)(v)(I),
subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)(A)]

As a result of the criminal violations set forth in Counts One through Eight, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(6)(A) which states:

Title 18 U.S.C. § 982. Criminal Forfeiture

(a)(6)(A) The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) ... of the Immigration and Nationality Act ... shall order that the person forfeit to the United States, regardless of any provisions of State law—

- (i) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii) any property real or personal—
 - (I) that constitutes or derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense for which the person is convicted; or
 - (II) that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

II.

Money Judgment

Money Judgment: A sum of money equal to the value of the proceeds from the immigration violations for which each Defendant is solely liable.

III.

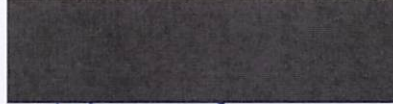
Substitute Property

If any proceeds from the immigration violations, as a result of any act or omission of the Defendants—

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or

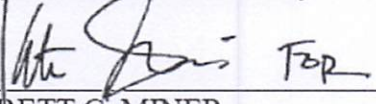
(E) has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States to seek the forfeiture of any other property of each
Defendant, up to the value of each money judgment, as substitute property pursuant to Title 21
U.S.C. § 853(p) and FED. R. CRIM. P. 32.2(e).

A TRUE BILL



For

MARGARET F. LEACHMAN
Acting United States Attorney

By: 
BRETT C. MINER
Assistant United States Attorney