

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

FEB 20 2026

Nathan Ochsner, Clerk of Court

United States of America

v.

Case No. C-26-137M

Rodney William GIPSON

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 February 19, 2026 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 United States Code § 1324

Did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.Submitted by electronic means, sworn to,
signature attested telephonically
per Fed. R. Crim. P. 4.1 and probable cause found:Date: February 20, 2026City and state: Corpus Christi, TexasJoshua Monahan
Complainant's signature

Joshua Monahan, HSI, Special Agent

Printed name and title

Jason B. Libby
Judge's signature

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

Affidavit

On February 19, 2026, at approximately 01:10 a.m., Rodney William GIPSON approached United States Border Patrol Agent (BPA) K. Burney in the primary lane at the Falfurrias, Texas (TX) United States Border Patrol (USBP) Checkpoint driving a green Kenworth tractor truck that was hauling a white trailer. BPA Burney questioned the driver as to his origin, destination and what he was hauling, to which GIPSON replied that he was hauling a "load" to a "town outside of Houston, TX" coming from "down in the valley". While BPA Burney was conducting the immigration inspection of GIPSON, BPA R. Montoya, along with his service canine Lio, conducted a free air sniff around the tractor/trailer. BPA Montoya informed BPA Burney that his canine partner was alerting to the rear of the trailer. BPA Burney instructed GIPSON to drive to the secondary inspection area for further investigation.

Once at the secondary inspection area, GIPSON exited the tractor and BPA's conducted further inspection of the tractor/trailer, based on the positive canine alert. GIPSON stated to agents that he was heading to an area near Rosenberg, TX, and that he did not know where he was going to go until he received further instructions. GIPSON further claimed to Border Patrol Agents that this was his first load, and that the load had been left 'somewhere' and that 'the trailer was already hooked up to the tractor when he arrived". While BPA Burney was speaking with GIPSON, BPA Montoya's canine partner again alerted to the trailer, which was sealed. BPA's cut the seal, which displayed the number A0970082. Once the seal was cut, BPA's opened the doors to the trailer and discovered a total of 24 subjects inside the trailer, which was otherwise completely empty.

All 24 individuals were determined to be citizens and nationals of various countries with no documentation to enter or remain in the United States legally.

At this point, all subjects were arrested and escorted into the Falfurrias, TX United States Border Patrol Checkpoint Station.

The subsequent search of the tractor resulted in the discovery of miscellaneous documents, including a bill of lading showing that the truck was supposed to be hauling a load of carrots, with a destination of a Texas Department of Criminal Justice (TDCJ) prison located in Rosharon, TX. The bill of lading displayed that the trailer had been sealed with seal bearing number A0970082. HSI Special Agent J. Monahan later received information from W. Sullivan, a manager at this facility, who stated that the bill of lading found in the tractor did not coincide with a legitimate order placed by the facility, and also told SA Monahan that the company that was referenced in the bill of lading had not been used by the prison facility since January. Furthermore, Mr. Sullivan provided SA Monahan with photos of various bills of lading from previous actual orders that had been delivered by this company, which were organized differently than the one located in the seized tractor. Additionally, Mr. Sullivan stated that this particular company did not place seal numbers on their bills of lading. HSI Special Agents conducted a further inspection of the bill of lading, and noticed various inconsistencies in the printing indicating that it was fraudulent.

Corpus Christi Homeland Security Investigations (HSI) Special Agent (SA) J. Monahan responded to Falfurrias, TX United States Border Patrol Checkpoint Station to assist in the investigation

Principal Statement- Rodney William GIPSON

BPA's provided GIPSON with his Miranda rights, which GIPSON acknowledged understanding by signing

the provided form. GIPSON told agents that he was willing to answer questions without a lawyer present. BPA's conducted an initial interview with GIPSON. When HSI Special Agents responded to the Falfurrias, TX Border Patrol Station, GIPSON was reapproached by SA J. Monahan and SA. S. P.... GIPSON again acknowledged understanding his Miranda rights and again agreed to speak to agents.

The following is a summary of the statement given by GIPSON and is not a verbatim transcription, nor does it represent the entirety of the interview. All interviews conducted with GIPSON were recorded by either audio or video recording equipment.

GIPSON stated that he had been hired to drive a tractor/trailer from McAllen, TX to an area near Houston, TX, and stated that he was following a GPS to "the prison", which was later determined to be Texas Department of Criminal Justice-Terrell Canning Plant, located at 1300 FM 655 in Rosharon, TX. GIPSON claimed to agents that he has been a professional truck driver for 28 years. GIPSON stated that, in late 2025, he was hired by a man named "Rene", that was going to pay him \$1,800 a week to drive tractor/trailers for him, and stated that this was the fourth trip he was supposed to make. (Agents note: While on primary inspection, GIPSON claimed to agents that this was his first load.) GIPSON told agents that, during a previous trip around the beginning of 2026, Rene told him that he would be driving the truck to the Rosenberg, TX area and would leave the truck somewhere, and that Rene's son would complete the delivery. GIPSON told agents that this trip resulted in him dropping the truck off at a Loves Gas Station in Rosenberg, TX, after having left McAllen, TX earlier that day.

GIPSON stated that on Tuesday (02/17/2026) he began communicating with the man, who facilitated his transportation from Palestine, TX to McAllen, TX using Uber's and buses. GIPSON stated that he had arrived in McAllen, TX on Wednesday (02/18/2026). While conducting his check of the tractor and trailer, GIPSON stated that he noticed there were several phones inside the "Little door" (underneath the sleeper compartment), but did not think anything of it. GIPSON then stated that he gave a cursory glance to the bill of lading and noticed that he was supposed to have been hauling a load of carrots that was supposed to have weighed 42,000 pounds, and later admitted that, based on his 28 years of experience as a commercial truck driver, that the trailer was not behaving as though it was that heavy. GIPSON stated that he plugged in the address for the prison based on what was on the bill of lading. GIPSON provided consent to SA's to search his cell phones, and confirmed that he had earlier signed forms given to him by Border Patrol Agents granting him consent. GIPSON pointed out to agents the cell phone number for "Rene".

GIPSON provided a narrative to agents stating that he had been staying at a Motel 6 in Edinburg, TX with another male subject, who was another truck driver working for "Rene". GIPSON told agents that that earlier on Thursday afternoon, he had been taken to a truck wash to pick up the truck, but while there, he was informed by "Rene" that the truck would be hauling another trailer that Rene's son was going to switch out. GIPSON then said that he then went back to the hotel and received a call later that night that the truck was ready. GIPSON stated that the truck had been moved to the Loves Gas Station located further north of the truck wash. He stated that he arrived to the truck, did a final walk around, logged a start time in his logbook of midnight, and began driving towards Houston, TX.

Material Witness Statement #1- Ngoh Remson Tegah

BPA-I Alexis Tovar read Ngoh Remson Tegah his rights as per form I-214 in his preferred language of

English. TEGAH stated that he understood his rights and was willing to answer questions at this time without an attorney present. BPA-I Melissa Martinez witnessed. On February 19, 2026, RGV SIU- FLF reported to the Falfurrias Checkpoint (USBP) to conduct an interview of, Ngho Remson TEGAH, who had been arrested in a failed 1 on 24 alien smuggling attempt, at the USBP checkpoint south of Falfurrias, TX. TEGAH stated he began traveling to the United States from his home country of Cameroon on November 2, 2025. TEGAH explained he flew to Brazil, and then began taking buses through Boliva, Peru, Ecuador, and Colombia until he arrived to Panama. In Panama, he explained walking on foot for 7 days through the Amazon forest until he reached Costa Rica. TEGAH explained his childhood friend from back home in Cameroon left to the United States and had connections who helped him through Panama. From Costa Rica, TEGAH took several buses through Nicaragua, Honduras, and Guatemala until he reached his destination of Mexico City. In Mexico City, he was met a subject by the name of "Amit" who helped coordinate his travel to Monterrey, Mexico, and then to Reynosa, Mexico where he illegally crossed the river into the United States.

At the river, TEGAH claims not understanding the two guides because they only spoke Spanish and he followed the group. He claims one of them was Mexican, light complected, with a beard, short hair and tattoos on his neck and arm. From the river, a vehicle picked them up and took them to a house in Rio Grande City, Texas. From this location, the subject stated he was transferred to a mobile home in McAllen, Texas where he stayed for approximately 20 subjects were at with no caretakers. The subject explained all the subjects in the house hours later were told to go outside and load into the back of a tractor/trailer that was parked outside.

TEGAH verbally provided consent for BPA's to search his cell phone, and signed a form granting that consent. TEGAH provided the number for the individual that had picked him up in McAllen, TX. HSI SA's noticed that this phone number was the same number that GIPSON had provided for "Rene".

Material Witness Statement #2- Michelle Estefania SUAREZ-Medina

BPA-I Hector Villarreal read SUAREZ-Medina, Michelle Estafania her right as per form I-214 in her preferred language of Spanish. SUAREZ stated that she understood his rights and was willing to answer questions at this time without an attorney present. Border Patrol Agent Jessica Camargo witnessed. SUAREZ-Medina stated she left Venezuela 8 years ago and crossed illegally and had resided in Dallas, Texas with her family after allegedly fixing her documentation. SUAREZ -Medina then told BPA's that she had a domestic dispute and was arrested and deported in January. SUAREZ-Medina stated that shortly after being deported, she made arrangements with a smuggler to cross back into the United States illegally, and that she was eventually successfully crossed into the United States by illegally crossing the reiver near Roma, TX. SUAREZ-Medina stated that she was housed along with other aliens in various houses within Miguel Aleman, prior to crossing into the United States. SUAREZ-Medina claimed that they were crossed into Roma, Texas near the border wall. SUAREZ-Medina then claimed that she was taken to several stash houses and staging spots within the United States by various young male drivers, before finally being brought to an abandoned trailer house on yesterday's date. SUAREZ-Medina stated that there were multiple aliens already at this house when she arrived. SUAREZ-Medina then told agents that a tractor/trailer arrived and the males in charge of the residence began loading up the aliens in groups of fives into the tractor. SUAREZ-Medina claimed that she never saw the driver or any of the men that were loading them up in the trailer. SUAREZ-Medina claimed that an illegal alien in the group of aliens was given a phone and was communicating with the suspected smugglers while they were concealed in the trailer. SUAREZ-Medina claimed that she was unable to see she could not see which of the smuggled aliens was

given the cell phone. SUAREZ-Medina claimed that shortly after they proceeded on their route north, they were all arrested. SUAREZ-Medina granted permission for agents to search her cell phone, and signed a form indicating her willingness.

Material Witness Statement #3-Ruben Dario RAMIREZ-Buelvas

I, Border Patrol Agent J. Salinas, advised RAMIREZ-Buelvas of his rights using Form I-214, in his preferred language of Spanish. RAMIREZ-Buelvas stated that he understood his rights and was willing to provide a statement without the presence of counsel at this time. Border Patrol Agent Sabrina Garcia and BPA-I K. Baldwin witnessed the advisement. This statement is not verbatim and is based on a subsequent interview with RAMIREZ-Buelvas.

RAMIREZ-Buelvas stated he began his journey to the United States around January 10, 2026, departing from Venezuela with the intention of reaching Houston, Texas. RAMIREZ-Buelvas claimed that after arriving in Mexico, he borrowed a new SIM card for his phone from an unidentified friend. RAMIREZ-Buelvas reported that he crossed the river from Miguel Aleman, Mexico, into Roma, Texas, on February 12, 2026, accompanied by his cousin, later identified as Otman Augusto Blanco-Aparicio. RAMIREZ-Buelvas told agents that after crossing the river, they passed through a barbed wire fence and walked for approximately 30 minutes until they reached a parking lot. RAMIREZ-BUELVAS stated that his cousin was in contact with the smuggling coordinator. RAMIREZ-Buelvas then told agents that after they reached the parking lot, he and his cousin were instructed to enter a white, two-door pickup truck and lie down in the truck bed. RAMIREZ-Buelvas stated that about 10 minutes, the truck was brought to a white house in an unknown location.

RAMIREZ-Buelvas then told agents that once at the house, they were told to surrender their phones to a dark-skinned male in his late fifties, described as having a beard and black hair with silver streaks. They remained at this location for approximately 20 minutes before being transported to another house, which was located about an hour away, where they stayed for two days. RAMIREZ-BUELVAS stated that he and his cousin were then taken to a hotel next to a large golf course at an unknown location. The hotel was booked under his cousin's name, but they only stayed for a few hours before being moved to another hotel in Edinburg, Texas, where they remained for approximately five days.

RAMIREZ-Buelvas then told agents that the group was picked up and transported to an area that was surrounded by brush, where there were already about seven people present. RAMIREZ-Buelvas told agents that after his group arrived, more individuals arrived shortly thereafter. RAMIREZ-Buelvas stated that shortly after, a vehicle arrived, and that a male subject opened the doors to a tractor/trailer, instructing everyone to board. RAMIREZ-BUELVAS stated that there were two individuals in the group-a female that he believed to be Mexican and an African male-who were given phones to communicate in case of emergency.

After boarding, RAMIREZ-Buelvas told agents that they traveled for approximately 30 minutes before the tractor/trailer stopped for about 15 minutes, which RAMIREZ-BUELVAS believed was for refueling or a

store visit. RAMIREZ-Buevas stated that while stopped, he could hear other vehicles nearby. The trailer then continued for about an hour before being discovered at the Falfurrias Border Patrol Station.

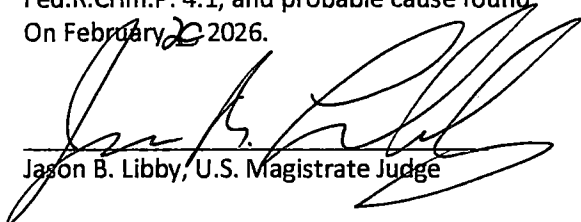
RAMIREZ-BUELVAS stated he paid \$8,000 USD to cross from Miguel Aleman, Mexico, into Roma, Texas, and his mother was to pay an additional \$5,000 via Zelle upon his arrival in Houston, Texas.

The facts of this case were presented to AUSA Joseph Griffith, who accepted prosecution of Rodney GIPSON for violation of 8 USC 1324, Alien Smuggling. TEGAH, SUAREZ-Medina, and RAMIREZ-Buevas were held as Material Witnesses.



Joshua Monahan
Homeland Security Investigations
Special Agent

Submitted by reliable electronic means, sworn to,
signature attested telephonically per
Fed.R.Crim.P. 4.1, and probable cause found
On February 20, 2026.



Jason B. Libby, U.S. Magistrate Judge