

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of New MexicoUnited States of America
v.
Jarol Wilberto ARROYO-Cerin

Case No:

25Mj2566

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 of June 25, 2025 in the county of Luna in the State and District of New Mexico, the defendant violated 8 U.S.C. § 1324(a)(1)(A)(v)(I)(Conspiracy to Violate 1324 - All subsections), an offense described as follows:

Knowingly, intentionally, and unlawfully conspired, combined, confederated and agreed with others known and unknown, to commit offenses against the United States, namely: to transport, move, and attempt to transport and move an alien within the United States by means of transportation and otherwise

This criminal complaint is based on these facts:

On June 25, 2025, Border Patrol Agent (BPAs) were assigned to the Deming Station Disrupt Unit. While patrolling Interstate 10 (I-10) near exit 85 on the east side of Deming, NM at approximately 12:25 a.m., BPA1 observed a tractor trailer hauling an empty flatbed which raised his suspicion. This is a known tactic often used by Transnational Criminal Organizations to conceal and further contraband into the United States. BPA1 notified BPA2, and BPA3, who also responded to I-10 to take a closer look at the red International Tractor Truck bearing a Maryland license plate pulling an empty flatbed bearing a Maine license plate. (See Attached Exhibit 1). BPAs were positioned on New Mexico State Road (NMSR) 26, Exit 82A on I-10, waiting for visual.

☒ Continued on the attached sheet.

by telephone, KS

Sworn to ~~before me and signed in my presence.~~

Date: June 27, 2025

City and state: Las Cruces, N.M.


Complainant's signature

Ivan Cobos, Agent

Printed name and title


KEVIN R. SWEAZEY
U.S. MAGISTRATE JUDGE

Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

STATE AND DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

V.

Jarol Wilberto ARROYO-Cerin

Continuation of Statement of Facts:

BPA1 followed the tractor trailer, and observed it exit at 82A and turn northbound on Gold Rd. BPAs followed the tractor trailer as it turned eastbound on NMSR 26. This route of travel is often used by Transnational Criminal Organizations to smuggle illegal aliens further into the United States by circumventing the United States Border Patrol Checkpoint located on I-25. It is uncommon and costly for tractor trailers to haul empty trailers and take this irregular route of travel from El Paso, TX to Albuquerque, NM. As BPAs got closer to the tractor trailer, they observed it slow down drastically and begin to swerve, as if the driver was paying more attention to the BPAs behind him than the road in front of him. BPA1 requested record checks on the Maine license plate through El Paso Law Enforcement Information Systems Specialists (LEISS). Records check came back negative. BPAs and a Deming Police Officer performed an investigatory stop on the semi-truck on NMSR 26 at approximately mile marker 11. BPA1 approached the driver side and identified himself as a United States Border Patrol Agent. The driver later identified as ARROYO-Cerin, Jarol Wilberto, was having a hard time understanding BPA1 due to wind and passing vehicles. BPA1 asked the driver to grab his paperwork and driver's license and step out and walk to the back so that they were not in on-coming traffic. BPA1 informed ARROYO-Cerin that he was performing an immigration check and ARROYO-Cerin stated he understood. BPA1 asked ARROYO-Cerin if they could check the cab of his semi-truck and he gave his consent. BPA1 requested checks on ARROYO-Cerin through El Paso LEISS and it came back clear and ARROYO-Cerin was a United States citizen. During the records request, BPA2 found a female hiding in the cab of the semi-truck. BPA3 walked around the semi-truck and encountered more individuals hiding in the storage bin (See Exhibits 2-3) and under the flatbed inside of the frame, laying on 2x4 boards (See Exhibits 4-9). ARROYO-Cerin was placed under arrest. BPAs read ARROYO-Cerin his rights via Miranda Rights card. ARROYO-Cerin stated he understood his rights, but did not want to speak any further. A total of 12 subjects were taken out of the storage and frame of the flatbed and 1 out of the cab. The 13 subjects (See Exhibit 10) were questioned as to their citizenship and immigration status, 1 subject admitted to being a national and citizen of Guatemala, another subject from Ecuador, and 11 subjects from Mexico, to include an unaccompanied juvenile. It was determined that all the subjects were without any immigration documents that would allow them to be or remain in the United States legally. All subjects admitted to jumping over the United States/Mexico International barrier illegally, without inspection by an immigration official, and without being admitted or paroled. All subjects were transported to the Deming Border Patrol Station.

Though not verbatim, ARROYO-Cerin provided the following post Miranda statement as to their involvement in the failed alien smuggling scheme:

ARROYO-Cerin openly admitted that he was approached by a known associate at a truck stop in Albuquerque, NM and was offered a job to transport contraband with his commercial vehicle, to which he later agreed to transport illegal aliens and admitted to transporting illegal aliens for the known associate multiple times prior and stated he would be financially compensated per illegal alien. ARROYO-Cerin admitted he picked up the illegal aliens in El Paso, TX at the Solana Mall by a Department store in the evening on June 24, 2025, and was going to transport the illegal aliens to Albuquerque, NM. ARROYO-Cerin admitted to successfully transporting illegal aliens to Albuquerque, NM approximately five different times in the past. ARROYO-Cerin transported approximately six illegal aliens each time. ARROYO-Cerin stated he is the owner of the tractor trailer and no one else has driven it, except one friend who drove it a long time ago. ARROYO-Cerin admitted that he was aware that the subjects he was transporting were illegal aliens. ARROYO-Cerin also admitted that he is the one that instructed the illegal aliens to get in the void underneath the flatbed.

Though not verbatim, MATERIAL WITNESS 1 provided the following post Miranda statement as to their involvement in the failed alien smuggling scheme:

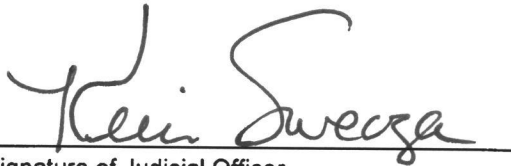
MATERIAL WITNESS 1 stated that they departed their home in Tlaxcala, Mexico and stayed in a house in Juarez, Chihuahua for two weeks before crossing the United States/Mexico International Boundary on June 24, 2025, near Mount Cristo Rey. After crossing into the United States, they then walked for approximately 30 minutes through the desert, got picked up in a black car and were driven to a mall, where a semi-truck was waiting for them. MATERIAL WITNESS 1 stated the driver of the semi-truck told them to get inside the cabin and to hide in the top compartment. MATERIAL WITNESS 1's destination was California and stated their family oversaw payment for them being smuggled into the United States and transportation to California.

Though not verbatim MATERIAL WITNESS 2 provided the following post Miranda statement as to their involvement in the failed alien smuggling scheme:

MATERIAL WITNESS 2 stated they are a citizen of Mexico. MATERIAL WITNESS 2 stated they were going to pay an unknown individual in United States currency to take him to Albuquerque, NM. MATERIAL WITNESS 2 stated that they crossed illegally into the United States on June 24, 2025, near Mt. Cristo Rey. MATERIAL WITNESS 2 stated they walked for approximately half an hour before he got picked up by a pickup truck, possibly a Toyota. MATERIAL WITNESS 2 stated that they were on their way to a stash house when they got word that the stash house was compromised.

MATERIAL WITNESS 2 was told that they didn't want to pay for a hotel and instead they were driven to a mall. When they arrived at the mall, the driver of the tractor trailer was already there waiting. The driver told MATERIAL WITNESS 2 to get inside a compartment under the trailer, with 2x4 boards and a rubber mat as the floor. MATERIAL WITNESS 2 stated they were hesitant to get in because it did not look safe, but then proceeded to get in. MATERIAL WITNESS 2 stated they were very upset and that they were very uncomfortable and unsafe inside the compartment and were in fear for their life.

Continuation of Statutory Language:



Signature of Judicial Officer



Signature of Complainant

Cobos, Ivan

Filing Agent