

United States Courts  
Southern District of Texas  
FILED

March 27, 2020

AO 91 (Rev. 11/11) Criminal Complaint

Felony

David J. Bradley, Clerk of Co

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America )

v. )

Karla IZAGUIRRE )

Case No. B-20-MJ-323 )

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 July 5, 2019 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 8, United States Code, Section 1324(a)(1)(A)(iii)	Any person who knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation.
and	
Title 8, United States Code, Section 1324(a)(1)(A)(v)	or Any person who engages in any conspiracy to commit the preceding act

This criminal complaint is based on these facts:

See Attachment "A"

Continued on the attached sheet.



Complainant's signature

Kevin J. Morehouse, Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to and signature attested as per Fed. Rules Cr. Proc. 4.1

Date: March 27, 2020



Judge's signature

City and state: Brownsville, Texas

Ignacio Torteya, U.S. Magistrate Judge

Printed name and title

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ATTACHMENT A

On January 17, 2020, special agents (SA) from Homeland Security Investigations (HSI) led Rio Grande Valley Child Exploitation Investigation Task Force (RGV CEITF), located in Brownsville, Texas, began an investigation into employee misconduct at Southwest Key Casa Padre, in Brownsville, TX. The referral was based on reporting by Health and Human Services regarding a contraband phone that was found in the possession of minors at the facility that contained nude photographs of an adult staff member.

Special Agents interviewed Evericka VELASQUEZ (hereinafter referred to as VELASQUEZ) regarding the above mentioned inappropriate relationships and possible enticement of minors. During her interview, VELASQUEZ consented to a review of her phone where a chat was discovered that discussed the planning and execution of the escape of a juvenile who resided at Southwest Key Casa Padre. Southwest Key Casa Padre is a contract facility utilized by the U.S. Department of Health and Human Services to house illegal alien juveniles. The chat was between VELASQUEZ and Karla IZAGUIRRE (hereinafter referred to as IZAGUIRRE) and also mentioned a third co-conspirator identified as Ada ORDAZ (hereinafter referred to as ORDAZ). All three women were employees of Southwest Key Casa Padre and were entrusted to care for the juveniles.

On March 4, 2020, a second interview was conducted with VELASQUEZ where she stated that she and IZAGUIRRE had discussed in a chat, to helping one of the illegal juveniles named [REDACTED] (hereinafter referred to as [REDACTED] and it should be noted that he is now an adult with an order of removal by an Immigration Judge) escape. VELASQUEZ further stated that ORDAZ would also be involved and was mentioned in the chat but was not a part of the chat. The chat contained several details regarding how and where [REDACTED] would escape and the details are corroborated by official reports about the escape. VELASQUEZ further stated that she, IZAGUIRRE, and ORDAZ used their positions at Southwest Key, to help plan the escape of [REDACTED] as it offered them access to him.

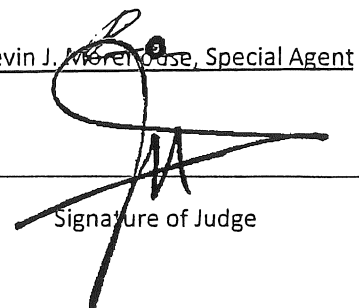
On July 5, 2019, while at a Southwest Key sponsored outing at the Harlingen Arts and Heritage Museum, [REDACTED] fled on foot and was subsequently picked up by ORDAZ and brought to IZAGUIRRE at a bus station in Brownsville, Texas. According to Title 8 of the United States Code section 1324, it is illegal for any person to know that an alien has come to the United States in violation of the law and then to conceal, harbor, or shield them from detection. IZAGUIRRE, ORDAZ, and VELASQUEZ were all trained and instructed by Southwest Key that they would be working with illegal alien juveniles. IZAGUIRRE, [REDACTED] and VELASQUEZ, have all stated during interviews that IZAGUIRRE provided [REDACTED] food, transportation, clothing, and shelter for approximately three months in reckless disregard of the fact that [REDACTED] was in the United States illegally and was already being provided food, clothing, medical care, and a place to live by Southwest Key, a lawful custodian within the United States.

On March 26, 2020, IZAGUIRRE was arrested for 8 USC 1324 (Harboring Certain Aliens). IZAGUIRRE stated that she did help plan the escape of [REDACTED] even though she knew he was illegally present in the United States. IZAGUIRRE then stated that for approximately three months she provided [REDACTED] with food, clothing, and shelter in her own home, shielding [REDACTED] from authorities even though he was already being cared for at the expense of the U.S. Government.

Submitted by reliable electronic means, sworn to, signature attested  
Telephonically per Fed.R.Crim.P.4.1, and probable cause found on

March 27, 2020 \_\_\_\_\_ Brownsville, TX  
Ignacio Torteya III \_\_\_\_\_ U.S. Magistrate Judge

Kevin J. Morehouse, Special Agent



Signature of Judge