

May 28, 2020

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO. B-20-275

KARLA IZAGUIRRE

§

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

From on or about July 5, 2019 to on or about October 5, 2019, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

KARLA IZAGUIRRE,

did knowingly and willfully conspire and agree with persons known and unknown to the Grand Jurors to violate Title 8, United States Code, Sections 1324(a)(1)(A)(iii), that is, the object of their conspiracy and agreement was to conceal, harbor, and shield from detection, an alien who had come to, entered, and remained in the United States in violation of law.

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

COUNT 2

From on or about July 5, 2019 to on or about October 5, 2019, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

KARLA IZAGUIRRE,

knowing or in reckless disregard of the fact that alien "J.G.", a minor, was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection, and attempt to conceal, harbor and shield from detection, such alien in any place, including any building and means of transportation.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324
(a)(1)(B)(ii).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY



NICOLE PIQUETTE
Assistant United States Attorney